

PORTLAND GENERAL ELECTRIC COMPANY

121 SW Salmon Portland OR 97204

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Implementation Date of Plan: 10-9-85

Site Plan For: HARBURTON SUBSTATION

This Plan is being fully implemented under PGE management approval and direction. The Plan is subject to amendment as site conditions, legislation, and prevention technology require. Current copies of this Plan must be kept readily available.

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC) CERTIFICATION FORM

ame of Facility:	Harborton Substation	
ype of Facility:	<pre>X Transmission Substation X Distribution Substation Other</pre>	=:
wner:	Portland General Electric Company 121 SW Salmon St Portland OR 97204 (503) 226-8111	
mplementation Date:	10-9-85	
anagement Approval:		
and approve plan	I have authority to commit the necessary resources as required to carry out this Spill Prevention attermeasure Plan. Signature	
	Name Fred H. Lamoureaux	= ==
	Title Manager, EM&C	
	Date October 3, 1985	
ertificat ion:		
familiar with th	y that I have examined the facility and, being ne provisions of 40 CFR, Part 112, attest that the sen prepared in accordance with good engineering	
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1.0 GENERAL INFORMATION ABOUT THE FACILITY

1.1 LOCATION OF THE FACILITY

Harborton Substation includes both Harborton Switchyard and Harborton East Substation. A regional and local map of the facility is shown in Attachment A.

1.2 PROXIMITY TO NAVIGABLE WATER

The Harborton Substation is located approximately 300 feet from the Willamette River. A dike separates the substation from the river. Surface runoff from the site enters a ditch west of the yard and flows northerly 3,000 feet to the Multnomah Channel. Most rainfall, however, will percolate into the soil.

1.3 TOPOGRAPHY AND SOIL CONDITIONS OF THE SITE

The substation is lightly graded to the west with many flat or even pocketed areas within the yard. The soil base is a river-dredged silty sand which is moderately pervious to the type of oil used at the facility. The facility is protected from soil erosion by 8 lnches of 3/4-in. minus 0-inch gravel. Penetration into the gravel is anticipated to be approximately 1-2 inches before cleanup operations are undertaken.

1.4 PHYSICAL DIMENSIONS OF THE SITE

The enclosed area is approximately 540 feet x 950 feet, totaling 11.8 acres. The total property area is irregularly shaped and encloses approximately 64 acres.

2.0 OIL AND OIL STORAGE AT THE FACILITY

2.1 PHYSICAL PROPERTIES OF OIL AND CONTAINMENT VESSELS

The oil stored at the facility is a low-toxic petroleum base insulating oil with a specific weight of 7.28 pounds per gallon and a specific gravity of 0.874. The minimum flash point is 145°C using American Standards of Testing and Measurement (ASTM) Test D-92. The maximum SUS viscosity of the oil using ASTM Tests D-445 and D-88 is as follows:

- @ 100°C 3.0/36 sec
- @ 40°C 12.0/66 sec
- @ O°C 76.0/350 sec

The containment vessels of concern are transformers and circuit breakers. The individual container capacity (gallons), failure flow-rate maximums (gallons per minute), description, and fail-safe engineering features are shown in Attachment B.

The direction of flow from the vessels is shown in Attachment A.

2.2 POTENTIAL CAUSES FOR OIL DISCHARGE

This SPCC Plan addresses the control of all oil discharges, from catastrophic failure through any other routine discharge cases. Catastrophic failure, although a very rare occurrence, produces the worst-case condition in terms of quantity of oil released and the extent of environmental pollution possible.

The probable causes of routine operations and catastrophic failure include:

2.2.1 Routine Operations

Small oil discharges can occur during equipment servicing and operation of the substation.

- Equipment Servicing Oil loss during filling or emptying of the containers will be approximately 25 gallons before shutoff can occur, if hose-fitting failure occurs. Upon noticing the discharge, the maintenance crew will close the container valve and shut down the pump. Cleanup operations, in accordance with the Oil Spill Contingency Plan (see Attachment C), will be initiated.
- Operation Cooling radiators and other equipment through which oil flows can develop leaks. PGE's good housekeeping practices require that the ground under such leaks be cleaned up and protected from

further contamination and that the leaking part be repaired by maintenance crews. The contaminated material will be removed and disposed of at a state-approved landfill.

2.2.2 Catastrophic Failure

Catastrophic failure of vessels containing oil is an unusual occurrence. Vessel failure is generally caused by internal pressure buildup resulting from electric arcing deep in the vessel. This occurs faster than relief valves can reduce the pressure. The result is tank rupture. Vandalism or acts of sabotage may also result in catastrophic tank failure.

- Transformers Up the two-thirds of the oil may be discharged from a transformer because of catastrophic failure. Approximately 70 percent of the discharge occurs immediately. If tank failure does not occur, minor oil discharges may result from oil being blown out of the pressure relief valve.
- <u>Circuit Breakers</u> Catastrophic failure of these devices may cause most of the oil to discharge immediately. If tank failure does not occur, venting could release minor amounts of oil.
- Oil Switches and Miscellaneous Vessels Catastrophic failure of these items may cause the entire contents to be discharged immediately; however, these items have a volume generally less than 50 gallons.

2.3 METHOD OF DETECTING OIL DISCHARGES

Small leaks or drips will be noted during regular maintenance checks. If a failure occurs at a substation, PGE System Control Center (SCC) is notified promptly of failure by outage reports from customers. Emergency maintenance crews are dispatched immediately to the substation.

3.0 SECONDARY CONTAINMENT SYSTEM

There is no secondary containment system planned for this site.

4.0 CLEANUP PROCEDURES

The Oil Spill Contingency Plan (see Attachment C) will be activated in the event of an oil discharge. The procedures used to control and remove the oil are given in this plan.

5.0 SECURITY

An 8-foot-high metal security fence surrounds the facility (see Attachment A). The gates are kept locked at all times except when PGE personnel are on the premises. PGE personnel regularly inspect the facility.

6.0 PERSONNEL TRAINING

Briefings for operating personnel are scheduled regularly to keep them informed of current oil-spill control techniques and equipment.

Current SPCC Plan requirements and pollution control laws, rules, and regulations are also included in these briefings.

Periodic information training sessions are held for division and other employees who might be involved in oil containment and cleanup operations.

The training program outlines steps to be followed in alerting various Company departments, governmental agencies, and cleanup personnel. Further information is provided in the attached Contingency Plan (see Attachment C).

7.0 INSPECTION AND RECORDS

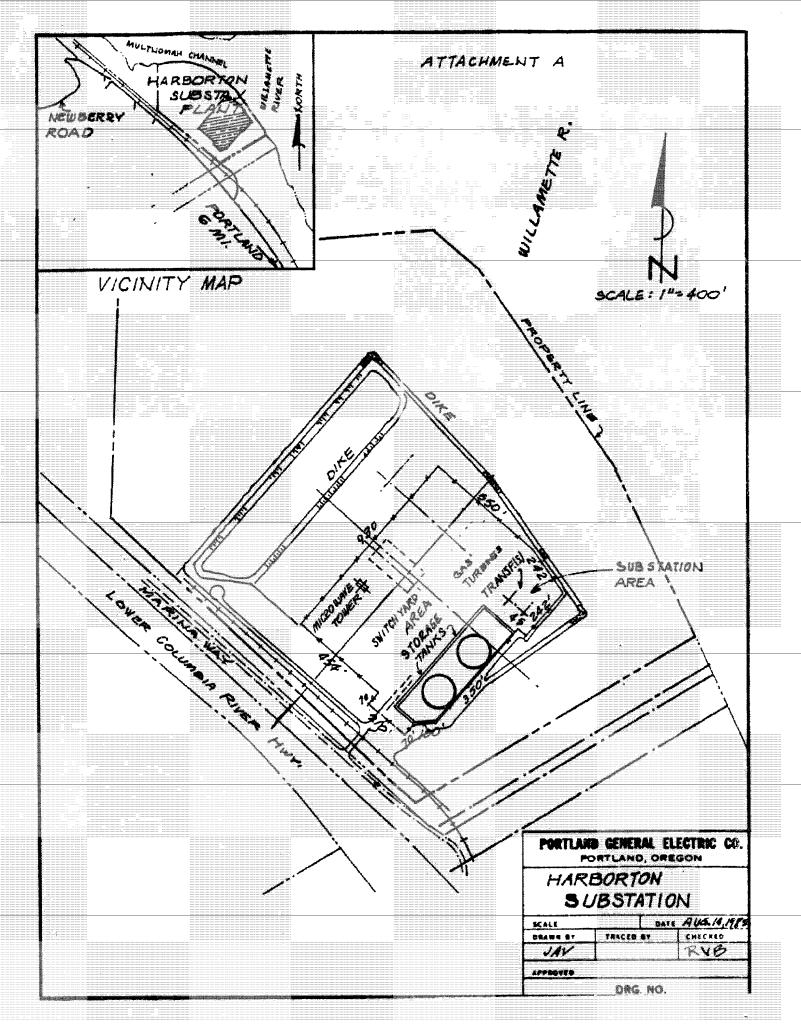
This plan shall be reviewed and evaluated at least once every three years from the date of management approval. In addition, any change in facility design, construction, operation, or maintenance which affects the facility's potential for the discharge of oil into navigable waters should be indicated by revision to the plan within six months of such change. All such reviews, evaluations, and revisions to this plan shall be documented on Attachment D.

8.0 SPILL HISTORY AT THE FACILITY

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			ATTACHMENT I		MANBURIUM BUEDINILUM	
Number of Containers	Type of Containers	Volume of Dil per Container (qallons)	Overland Flow Rate from Container Igpm)	Description of Tank Design and Construction	Fail-Sufe Engineering Features	
	Transforaer	6480	533	Rectangular steel tank with flat steel base. 6' x 14' x 14'H	Pressure Relief Valve	
	Transformer		479	Rectangular steel tank mith skid etd. base. 6' x 13' x 15.5'H	Prosure Rolled Valve	
	0,0,3	7.7	60	3 Tanks/unit with circular steel case and skid mounted. 4.5 dia.x B'H		
	0.0.0.			Circular steel tank with round steel top & flat bottom. 2'dim.x 2.5'H		
1	0.6.9.	4		Circular steel tank with apherical cast steel top & flat bottom.	Yent - Pipe	
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OIL SPILL CONTINGENCY PLAN (Attachment C)

A copy of the Contingency Plan is kept on file at DMAC headquarters in the Hawthorne Building. In addition to this Contingency Plan, procedural guides outlining the steps to be followed in the reporting of any oil discharge to the System Control Center are conspicuously attached to an inside wall of the battery or control house.

A procedural guide is also kept at the System Control Center outlining the steps to be taken by that office in notifying the EM&C Department.

In the event an oil discharge occurs at this site, the following contingency plan will immediately be initiated.

- A. Immediate Action to Be Taken if Company Personnel Are on Site
 - 1. Make every reasonable effort to stop or retard the flow of oil from the container with manpower, equipment, and materials on site or otherwise immediately available.
 - 2. Notify the System Control Center at 226-8343 of the following conditions:
 - a. The station name.
 - b. Location.
 - c. Equipment from which the oil discharge originated.
 - d. An approximation of direction and quantity of flow.
 - e. Required time of response.
 - f. Water bodies or streams that might be involved.
- B. Action to Be Taken by System Control Center Upon Motification of Oil Discharge

The System Control Center will immediately notify the Environmental Services Department and the EM&C Manager's office or the designated representative per EM&C's Emergency Call-Out Procedure. (See Division Operations Document 2010-1 and SOP 10-100.)

C. Action to Be Taken by KM&C Manager's Office

Dispatch Company personnel to evaluate and begin containment and cleanup.

D. Action to be Taken by Environmental Services Department

Environmental Services Department will report the discharge to one or more of the following:

Discharges reaching navigable waters:

Duty Officer, Mational Response Center U.S. Coast Guard 400 7th St SW Washington DC 20590 Tel. (800) 424-8802 (24 hours)

and

State of Oregon Department of Environmental Quality
522 SW 5th
PO Box 1760
Portland OR 97207 .

Tel. (800) 452-0311 (24 hours)

FAILURE TO NOTIFY BOTH OF THE ABOVE AGENCIES IS A CRIMINAL OFFENSE PUNISHABLE BY A \$10,000 FINE AND/OR UP TO ONE YEAR IMPRISONMENT (PL-92-500).

 Discharges not reaching navigable waters (per OAR 340-47-015):

State of Oregon Department of Environmental Quality 522 SW 5th PO Box 1760 Portland OR 97207 Tel. (800) 452-0311 (24 hours)

In the event DEO cannot be reached:

Duty Officer, Mational Response Center U.S. Coast Guard 400 7th St SW Washington DC 20590 Tel. (800) 424-8802 (24 hours)

PAILURE TO NOTIFY THE OREGON STATE DEPARTMENT OF ENVIRON-MENTAL QUALITY SHALL BE SUBJECT TO A CIVIL PENALTY OF NOT LESS THAN \$50 NOR MORE THAN \$10,000 FOR EACH DAY OF VIOLATION.

- E. Containment and Removal of Discharged Oil and Contaminated Debris
 - All catch basins or drainage structures will be temporarily bermed or dammed to prevent oil from entering established watercourses or municipal drainage and sewer systems.
 - Sorbent materials such as Fibrelite, absorbent pads, hay, sawdust, or sand shall be applied to the discharge area to absorb and contain the oil.

- 3. If Company personnel and equipment cannot contain the discharge or it gets beyond the fenced area or if the magnitude of the discharge is such that additional manpower, equipment, or materials are required, contact Environmental Emergency Services Company at (503) 285-9111. Portland General Electric Company maintains a contractual agreement with Environmental Emergency Services Company to provide manpower, equipment, and materials requirements within the service area.
- 4. Company personnel and/or Environmental Emergency Services
 Company shall completely clean up, remove, and dispose of
 oil and contaminated materials. Sorbent materials, pumping
 equipment, front-end loaders, dump trucks, and other equipment
 deemed necessary shall be made available on an emergency
 priority basis to effect the cleanup process.
- 5. Sorbent materials, oil-soaked soil and gravel, and other contaminated debris will be removed from the discharge site only with the approval of the DEQ Solid Waste Hanagement Section to an authorized solid waste landfill.
- 6. Removal of waterborne oil and contaminated waste will be accomplished by Environmental Emergency Services Company with contaminated materials disposed of in accordance with State of Oregon DEQ regulations.

F. Follow-Up Report

- 1. EMAC will prepare a complete report for the Environmental
 Services Department for subsequent submission to the U.S.
 Environmental Protection Agency and the State of Oregon
 Department of Environmental Quality. The report shall outline
 circumstances of the discharge, notification of appropriate
 Company and governmental agency personnel, containment procedures, removal and cleanup procedures, and final waste
 disposal procedures. This report will be filed no later than
 seven days following the oil discharge incident.
- The certifying engineer will review and make appropriate amendments to the SPCC Plan in accordance with 40 CFR Part 112.5.

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PORTLAND GENERAL ELECTRIC COMPANY

OIL SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

REVISIONS

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PORTLAND GENERAL ELECTRIC COMPANY

121 SW Salmon Portland OR 97204

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Implementation Date of Plan: 10-17-86 (REV 1)

Site Plan For: HARBORTON TANK FARM

This Plan is being fully implemented under PGE management approval and direction. The Plan is subject to amendment as site conditions, legislation, and prevention technology require. Current copies of this Plan must be kept readily available.

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SPILL PREVL .ION CONTROL AND COUNTERMEASURE . .AN (SPCC) CERTIFICATION FORM

Name of Facility:	Harborton Tank Farm
Type of Facility:	Transmission Substation
-	Distribution Substation
	X Other Tank Farm
	A Other Tank Farm
Owner:	Therefore 3 Co. 1 White the
Owner.	Portland General Electric Company
	121 SW Salmon St
	Portland OR 97204
	(503) 226-8111
Implementation Date:	September 11, 1974
Management Approval:	,
and approve plan	have authority to commit the necessary resources s required to carry out this Spill Prevention termeasure Plan
	Signature Monument
	NameF. H. Lamoureaux
	Title General Manager, EM&C
	Date <u>OCT 14</u> 1986
Certification:	
familiar with the	that I have examined the facility and, being e provisions of 40 CFR, Part 112, attest that the en prepared in accordance with good engineering
<u> </u>	Signature Raymond Halickif.
TO THE STATE OF TH	Name Raymond Halicki Jr.
CO73	Professional Engineer Registration No. 6973
1. DESCRIPTION OF THE PROPERTY	State Oregon
Or 25 /01/	
20,	DateOCT. 14, 1986

1.0 GENERAL INFORMATION ABOUT THE FACILITY

1.1 LOCATION OF THE FACILITY

The Harborton Tank Farm is located along the Willamette River, approximately two miles north of the St. John's Bridge off of N. W. St. Helens Road. A regional and local map of the facility is shown in Attachment A.

1.2 PROXIMITY TO NAVIGABLE WATER

The Harborton Tank Farm is located approximately 800-feet from the Willamette River. Two dikes, one about the perimeter of the property and another about the tank farm itself, seperate the tank farm from the river. Surface runoff from the area outside of the bermed tanks enters ditch west of the yard and flows north about 3,000-feet to the Multnomah Channel. Most rainfall in this area, however, will percolate into the soil.

1.3 TOPOGRAPHY AND SOIL CONDITIONS OF THE SITE

The property slopes generally to the west, but many areas are flat and pond water. The soil is river dredged silty sand which is moderately pervious to oil. The maximum penetration into the soil is anticipated to be approximately 1 to 3 inches.

1.4 PHYSICAL DIMENSIONS OF THE SITE

The fenced area is approximately 900-feet by 800-feet, or about 16.5 acres. The size of PGE's parcel at this site is 64 acres.

2.0 OIL STORAGE AND SECONDARY CONTAINMENT SYSTEM

2.1 TANK FARM AREA

Two 94,000-barrel fuel tanks are surrounded by an impervious clay-lined berm with sufficient capacity to hold the contents of one tank with an approximately 15 percent safety factor. Minor oil spills in this area will be manually cleaned up and the impervious surface repaired. Larger quantities of oil would drain to one or both of the sumps in the area where it would be contained until manually removed for disposal.

The diked area surrounding the tanks has sumps located inside the area just south of each tank. Drain pipes with valves that are normally closed and locked run from these sumps through the berm. These valves are opened only under close surveillance to permit surface water to drain from the berm area.

The pumps, filters, and other equipment for the fuel-forwarding machinery are mounted on a curbed, concrete mat that drains into a sump. The mat is located inside a small diked area that also drains into the sump. Overflow from the sump runs into a tank that must be emptied manually and the contents disposed of as required by environmental regulations.

2.2 MARINE TANKER UNLOADING FACILITY

Tanker unloading is manual with personnel present on the dock and on board ship at all times during this operation.

Fuel unloading equipment is mechanical joint type with hoist beams and hoses. Fuel unloading piping is of all welded construction.

Fuel unloading hoses are drained before they are swung out for coupling to the tanker. A vent valve is provided at the high point of each unloading hose to permit complete drainage. Any residual amount will be drained into a drip pan for manual removal. The hoses are also drained after use and prior to disconnecting from the tanker.

Flange covers are installed on the inlet flanges of each marine unloading hose to eliminate oil drip due to incomplete drainage and to eliminate a possible source of hazard when the hoses are not in use. These covers are removed by the oil tanker crew prior to connection to the ship's cargo discharge flanges and reinstalled following disconnection.

Minor oil drip caused by incompletely drained unloading hoses while removing or reinstalling unloading hose flange covers is contained on board the ship containment aprons for removal by the ship's crew.

A curbed oil containment pan is installed under the unloading hose on the dock to catch drip. Oil from this pan is drained into a holding tank for manual removal.

Major oil leakage during tanker unloading is extremely unlikely under normal operation. It may occur in the event of an accident, such as a major collision or the ship breaking loose from its moorings while connected to the unloading hose. This could cause rupture of the oil piping and associated equipment. In such a case, personnel are always present, both on board ship and on the shore facility. The ship's crew will stop the cargo pumps, and the shore crew will close all isolating valves to stop further loss of oil. In such an event, oil cannot be contained on board ship or on the dock and will spill to the river.

During tanker oil unloading operations, spills resulting from a pipeline rupture will be limited by operators on duty by stopping shipboard unloading pumps and closing the pipeline shutoff valves. If a break occurs when the system is not in use, the spill will be limited to the contents of a portion of the pipeline depending on the exact location of the break.

2.3 PROCESS AREA

All oil-handling equipment other than piping is provided with curbed aprons that are manually emptied. Piping is all welded construction.

Fuel oil piping can be drained to oil sumps. Sump pumps are installed to return oil to the raw storage tanks or to a mobile tanker as necessary.

2.4 DISTILLATE FUEL OIL BAILCAR AND TRUCK LOADING AND UNLOADING FACILITY

Rail loading and truck unloading use the same facilities and are manual operations requiring attending personnel. Bottom-connected hosing and a loading/unloading pump are employed for this operation.

The fuel pumps are located at the fuel unloading station to permit visual monitoring by operators at all times during unloading or loading.

Fuel hoses are provided with caps at each end to prevent spills while handling hoses.

Hoses are drained or pumped out to the main fuel header prior to disconnecting. Drainage is also possible after the hoses are disconnected to local storage drums.

Fuel header valves are locked closed when the system is not in use.

In the event of an oil spill such as one that may be caused by a ruptured hose during loading or unloading, the operators stop the pumps and manually close the affected outlet valve on the tank car to stop further spillage.

The rail unloading area is graded using crushed stone or equivalent. Oil spills are contained in this area.

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3.0 CLEANUP PROCEDURES

The Oil Spill Contingency Plan (see Attachment C) will be activated in the event of an oil discharge. The procedures used to control and remove the are given in this plan.

4.0 SECURITY

An 8-foot high metal security fence surrounds the facility (see Attachment A). The gates are kept locked at all times except when PGE personnel are on the premises. PGE personnel regularly inspect the facility.

5.0 PERSONNEL TRAINING

Briefings for operating personnel are scheduled regularly to keep them informed of current oil spill control techniques and equipment. Current SPCC Plan requirements and pollution control laws, rules, and regulations are also included in these briefings.

Periodic information training sessions are held for division and other employees who might be involved in oil containment and cleanup operations.

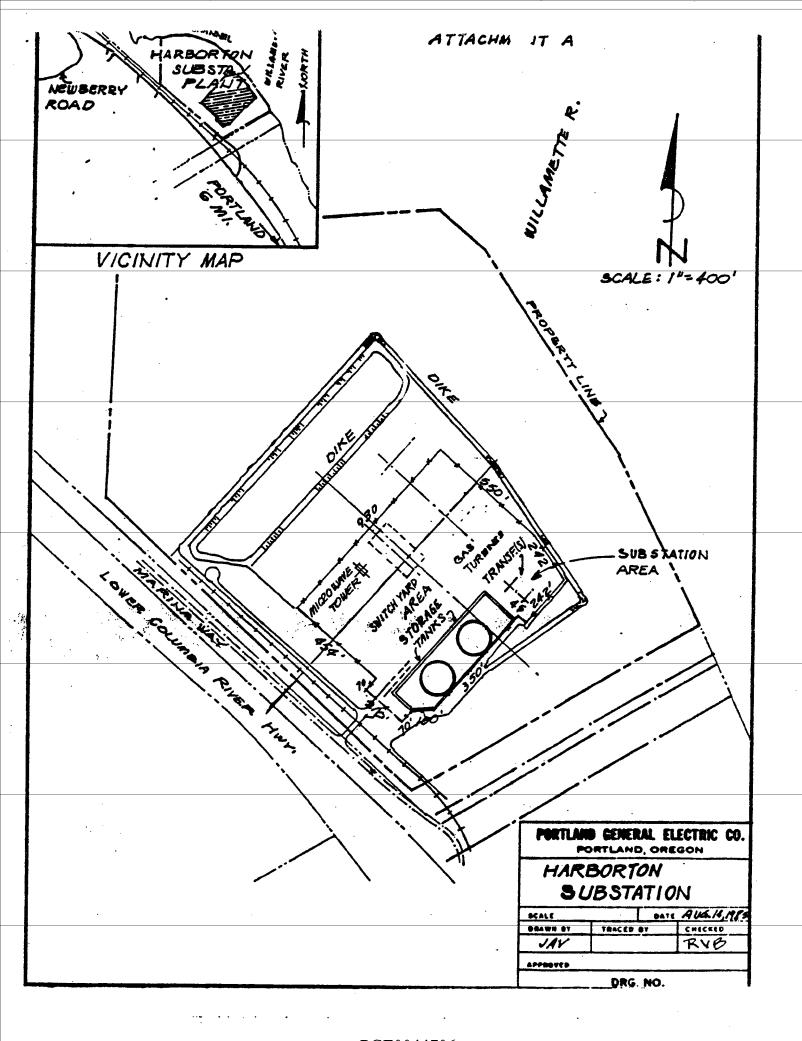
The training program outlines steps to be followed in alerting various Company departments, governmental agencies, and cleanup personnel. Further information is provided in the attached Contingency Plan (see Attachment C).

6.0 INSPECTION AND RECORDS

This plan shall be reviewed and evaluated at least once every three years from the date of management approval. In addition, any change in facility design, construction, operation or maintenance which affects the facility's potential for the discharge of oil into navigable waters should be indicated by revision to the plan within six months of such change. All such reviews, evaluations, and revisions to this plan shall be documented on Attachment D.

7.0 SPILL HISTORY AT THE FACILITY

<u>Date</u>	Volume Spilled	Cause and Cleanup
		
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	•	•
		
		,



OIL SPILL CONTINGENCY PLAN (Attachment C)

A copy of the Contingency Plan is kept on file at EM&C headquarters in the Hawthorne Building. In addition to this Contingency Plan, procedural guides outlining the steps to be followed in the reporting of any oil discharge to the System Control Center are conspicuously attached to an inside wall of the battery or control house.

A procedural guide is also kept at the System Control Center outlining the steps to be taken by that office in notifying the EM&C Department.

In the event an oil discharge occurs at this site, the following contingency plan will immediately be initiated.

A. Immediate Action to Be Taken if Company Personnel Are on Site

- 1. Make every reasonable effort to stop or retard the flow of oil from the container with manpower, equipment, and materials on site or otherwise immediately available.
- 2. Notify the System Control Center at 226-8343 of the following conditions:
 - a. The station name.
 - b. Location.
 - c. Equipment from which the oil discharge originated.
 - d. An approximation of direction and quantity of flow.
 - e. Required time of response.
 - f. Water bodies or streams that might be involved.
- B. Action to Be Taken by System Control Center Upon Motification of Oil Discharge

The System Control Center will immediately notify the Environmental Services Department and the EM&C Manager's office or the designated representative per EM&C's Emergency Call-Out Procedure. (See Division Operations Document 2010-1 and SOP 10-100.)

C. Action to Be Taken by EM&C Hanager's Office

Dispatch Company personnel to evaluate and begin containment and cleanup.

D. Action to be Taken by Environmental Services Department

Environmental Services Department will report the discharge to one or more of the following:

1. Discharges reaching navigable waters:

Duty Officer, Mational Response Center U.S. Coast Guard 400 7th St SW Washington DC 20590 Tel. (800) 424-8802 (24 hours)

. and

State of Oregon Department of Environmental Quality 522 SW 5th PO Box 1760 Portland OR 97207 Tel. (800) 452-0311 (24 hours)

FAILURE TO WOTIFY BOTH OF THE ABOVE AGENCIES IS A CRIMINAL OFFENSE PUNISHABLE BY A \$10,000 FINE AND/OR UP TO ONE YEAR IMPRISONMENT (PL-92-500).

2. Discharges not reaching navigable waters (per OAR 340-47-015):

State of Oregon Department of Environmental Quality
522 SW 5th
PO Box 1760
Portland OR 97207
Tel. (800) 452-0311 (24 hours)

In the event DEQ cannot be reached:

Duty Officer, Mational Response Center U.S. Coast Guard 400 7th St SW Washington DC 20590 Tel. (800) 424-8802 (24 hours)

FAILURE TO NOTIFY THE OREGON STATE DEPARTMENT OF ENVIRON-MENTAL QUALITY SHALL BE SUBJECT TO A CIVIL PENALTY OF NOT LESS THAN \$50 NOR MORE THAN \$10,000 FOR EACH DAY OF VIOLATION.

E. Containment and Removal of Discharged Oil and Contaminated Debris

- 1. All catch basins or drainage structures will be temporarily bermed or dammed to prevent oil from entering established watercourses or municipal drainage and sewer systems.
- Sorbent materials such as Fibrelite, absorbent pads, hay, sawdust, or sand shall be applied to the discharge area to absorb and contain the oil.

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 oil and contaminated materials. Sorbent materials, pumping
 equipment, front-end loaders, dump trucks, and other equipment
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 priority basis to effect the cleanup process.
- 5. Sorbent materials, oil-soaked soil and gravel, and other contaminated debris will be removed from the discharge site only with the approval of the DEQ Solid Waste Management Section to an authorized solid waste landfill.
- 6. Removal of waterborne oil and contaminated waste will be accomplished by Environmental Emergency Services Company with contaminated materials disposed of in accordance with State of Oregon DEQ regulations.

F. Follow-Up Report

- 1. EMEC will prepare a complete report for the Environmental Services Department for subsequent submission to the U.S. Environmental Protection Agency and the State of Oregon Department of Environmental Quality. The report shall outline circumstances of the discharge, notification of appropriate Company and governmental agency personnel, containment procedures, removal and cleamy procedures, and final waste disposal procedures. This report will be filed no later than seven days following the oil discharge incident.
- 2. The certifying engineer will review and make appropriate amendments to the SPCC Plan in accordance with 40 CFR Part 112.5.

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ATTACHMENT D

PORTLAND GENERAL ELECTRIC COMPANY SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

REVISIONS

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APPENDIX E SPILL PREVENTION PROCEDURES FOR THE HARBORTON SUBSTATION

PORTLAND GENERAL ELECTRIC COMPANY

121 SW Salmon Portland OR 97204

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

FOR HARBORTON SUBSTATION

Implementation Date of Plan: October 9, 1985

Latest Revision Date: March 5,1996

This Plan is being fully implemented under PGE management approval and direction. The Plan is subject to amendment as site conditions, legislation, and prevention technology require. Current copies of this Plan must be kept readily available.

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC) CERTIFICATION FORM "A"

Various Substation Properties

Portland General Electric Company 121 S.W. Salmon St. Portland, OR 97204 (503) 464-8820

Management Approval:

I certify that I have authority to commit the necessary resources and approve plans required to carry out this Spill Prevention Control and Countermeasure Plan.

Signature	George X Vannue
Name	George Normine
Title	Manager FMCC

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC) CERTIFICATION FORM "B"

Harborton Substation Owner:

Portland General Electric Company

121 SW Salmon St Portland, OR 97204 (503) 464-8820

Implementation Date: October 9, 1985

Certification:

I hereby certify that I have examined these facilities and, being familiar with the provisions of 40 CFR, Part 112, attest that the SPCC Plan has been prepared in accordance with good engineering practices.

Signature William E. Laurian

Name

William E. Lawson

Professional Engineer Registration No. <u>9682</u>

State

Oregon

Date

March 5,1996



1.0 GENERAL INFORMATION ABOUT THE FACILITY

1.1 LOCATION OF THE FACILITY

A regional and local map of the facility is shown in Attachment A.

1.2 PROXIMITY TO NAVIGABLE WATER

The Harborton Substation is located approximately 300 feet from the Willamette River. A dike separates the substation from the river. The surface runoff is drained from the site to a ditch west of the yard that flows northernly 3,000 feet to the Multnomah Channel. Runoff normally percolates into the soil.

1.3 TOPOGRAPHY AND SOIL CONDITION OF THE SITE

The substation yard is lightly sloped to the west with many level and pocketed areas within the yard. In reference to Soil Survey, Multnomah County, Oregon by the U.S. Soil Conservation Service, the soil in the site is basically urban land, mostly altered during development. Original soils were gravelly loam, silt loam, or silty clay loam with some sandy material. Drainage, permeability, and runoff flow are not known. The substation yard is protected from erosion by 8 inch thick 3/4-inch minus crushed rock. Oil spill penetration into the soil is estimated to be 1 inch to 2 inches before cleanup operations are undertaken.

1.4 PHYSICAL DIMENSIONS OF THE SITE

The substation yard is enclosed by a standard industrial type metal chainlink fence approximately 540 feet by 950 feet with a total area of 11.8 acres and within the irregular shape property area totalling 64 acres.

2.0 OIL AND OIL STORAGE AT THE FACILITY

2.1 PHYSICAL PROPERTIES OF OIL AND CONTAINMENT VESSELS

The oil stored at the facility is a low-toxic petroleum base insulating oil with a specific weight of 7.28 pounds per gallon and a specific gravity of 0.874. The minimum flash point is 145°C using American Standards of Testing and Measurement (ASTM) Test D-92. The maximum SUS viscosity of the oil using ASTM Tests D-445 and D-88 is as follows:

@ 100°C 3.0/36 sec @ 40°C 12.0/66 sec @ 0°C 76.0/350 sec

The containment vessels of concern are transformers and circuit breakers. The individual container capacity (gallons), failure flow-rate maximums (gallons per minute), description, and fail-safe engineering features are shown in Attachment B.

The direction of flow from the vessels is shown in Attachment A.

2.2 POTENTIAL CAUSES FOR OIL DISCHARGE

This SPCC Plan addresses the control of all oil discharges, from catastrophic failure through any other routine discharge cases. Catastrophic failure, although a very rare occurrence, produces the worst-case condition in terms of quantity of oil released and the extent of environmental pollution possible.

The probable causes of routine operations and catastrophic failure include:

2.2.1 Routine Operations

Small oil discharges can occur during equipment servicing and operation of the substation.

- Equipment Servicing Oil loss during filling or emptying of the containers will be approximately 25 gallons
 before shutoff can occur, if hose-fitting failure
 occurs. Upon noticing the discharge, the maintenance
 crew will close the container valve and shut down the
 pump. Cleanup operations, in accordance with the Oil
 Spill Contingency Plan (see Attachment C), will be
 initiated.
- Operation Cooling radiators and other equipment through which oil flows can develop leaks. PGE's good housekeeping practices require that the ground under such leaks be cleaned up and protected from

further contamination and that the leaking part be repaired by maintenance crews. The contaminated material will be removed and disposed of at a state-approved landfill.

2.2.2 <u>Catastrophic Failure</u>

Catastrophic failure of vessels containing oil is an unusual occurrence. Vessel failure is generally caused by internal pressure buildup resulting from electric arcing deep in the vessel. This occurs faster than relief valves can reduce the pressure. The result is tank rupture. Vandalism or acts of sabotage may also result in catastrophic tank failure.

- Transformers Up the two-thirds of the oil may be discharged from a transformer because of catastrophic failure. Approximately 70 percent of the discharge occurs immediately. If tank failure does not occur, minor oil discharges may result from oil being blown out of the pressure relief valve.
- <u>Circuit Breakers</u> Catastrophic failure of these devices may cause most of the oil to discharge immediately. If tank failure does not occur, venting could release minor amounts of oil.
- Oil Switches and Miscellaneous Vessels Catastrophic failure of these items may cause the entire contents to be discharged immediately; however, these items have a volume generally less than 50 gallons.

2.3 METHOD OF DETECTING OIL DISCHARGES

Small leaks or drips will be noted during regular maintenance checks. If a failure occurs at a transmission or distribution substation, PGZ System Control Center (SCC) is notified promptly of failure by outage reports from customers. Emergency maintenance crews are dispatched immediately to the substation.

3.0 SECONDARY CONTAINMENT SYSTEM

There is currently no secondary containment system at Harborton Substation.

4.0 CLEANUP PROCEDURES

The Oil Spill Contingency Plan (see Attachment C) will be activated in the event of an oil discharge. The procedures used to control and remove the oil are given in this plan.

5.0 SECURITY

An 8-foot-high metal security fence surrounds the facility (see Attachment A). The gates are kept locked at all times except when PGE personnel are on the premises. PGE personnel regularly inspect the facility.

6.0 PERSONNEL TRAINING

Briefings for operating personnel are scheduled regularly to keep them informed of current oil-spill control techniques and equipment. Current SPCC Plan requirements and pollution control laws, rules, and regulations are also included in these briefings.

Periodic information training sessions are held for division and other employees who might be involved in oil containment and cleanup operations.

The training program outlines steps to be followed in alerting various Company departments, governmental agencies, and cleanup personnel. Further information is provided in the attached Contingency Plan (see Attachment C).

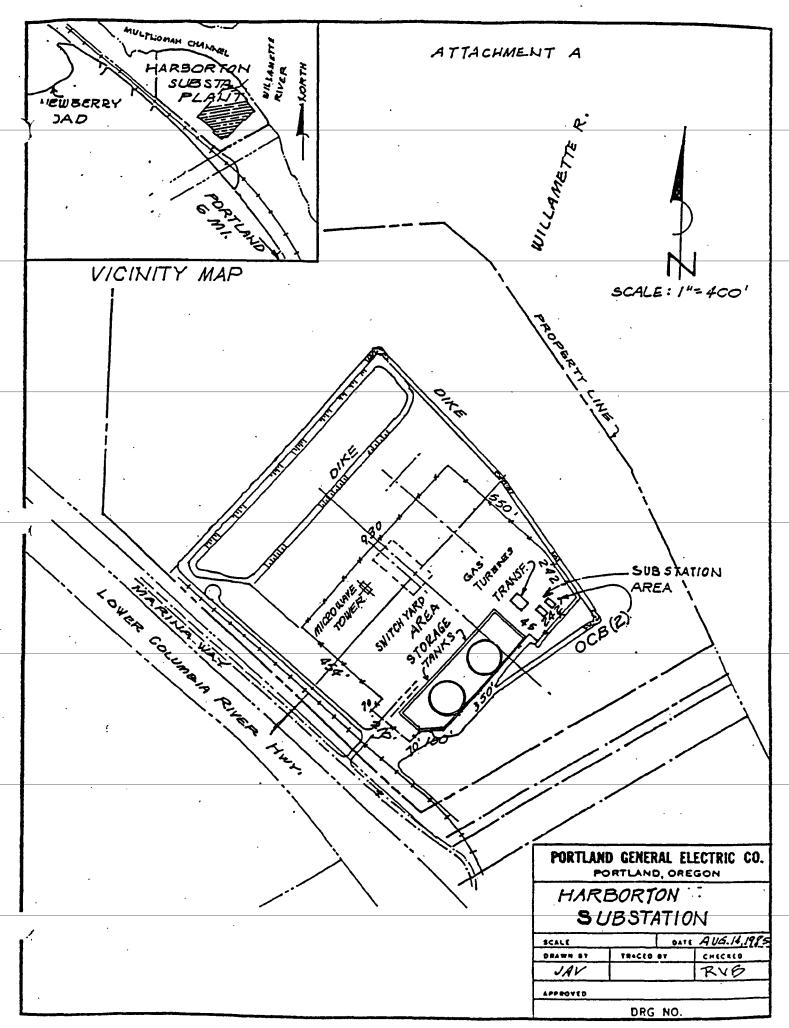
7.0 INSPECTION AND RECORDS

This plan shall be reviewed and evaluated at least once every three years from the date of management approval. In addition, any change in facility design, construction, operation, or maintenance which affects the facility's potential for the discharge of oil into navigable waters should be indicated by revision to the plan within six months of such change. All such reviews, evaluations, and revisions to this plan shall be documented on Attachment D.

8.0 SPILL HISTORY AT THE FACILITY

<u>Date</u>	Volume Spilled	Cause and Cleanup				
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RFVB/5bc 6965L.0385



3/23/93

ATTACHMENT B

Page 1

Number of Units	Number of Containers per Unit		Volume of Oil /container (Gallons)	Overland Flow Rate from Container (gpm)	Description of Tank Design and Construction	Fail-Safe Engineering Features
2 .	. 1	OIL BRKR DIST	55	10	Circular steel tank m/round steel top & flat bottom. 2'D x 2.5' H	Vent Pipe
1	1	OIL BRKR DIST	76	10	Rectangular steel tank w/skid mtd. base 2.5' x 5' x 7'%	Vent Pipe
1 .	1	TRANSFHR LTC	6483	575	Rectangular steel tank w/flat plate base. 6' x 14' x 13'N	Pressure Relief Valve

Note: Containers of less than 40 gal. capacity may not be listed.

PGE0044722

OIL SPILL CONTINGENCY PLAN (Attachment C)

A copy of the Contingency Plan is kept on file at EM&C headquarters in Oregon City. In addition to this Contingency Plan, procedural guides outlining the steps to be followed in the reporting of any oil discharge to the System Control Center are conspicuously attached to an inside wall of the battery or control house.

A procedural guide is also kept at the System Control Center outlining the steps to be taken by that office in notifying the EM&C Department.

In the event an oil discharge occurs at this site, the following contingency plan will immediately be initiated.

- A. Immediate Action to be Taken if Company Personnel Are on Site
 - 1. Make every reasonable effort to stop or retard the flow of oil from the container with manpower, equipment, and materials on site or otherwise immediately available.
 - 2. Notify the System Control Center at 464-8343 of the following conditions:
 - a. The station name.
 - b. Location.
 - c. Equipment from which the oil discharge originated.
 - d. An approximation of direction and quantity of flow.
 - e. Required time of response.
 - f. Water bodies or streams that might be involved.
- B. Action to be Taken by System Control Center Upon Notification of Oil Discharge

The System Control Center will immediately notify the Environmental Services Department and the EM&C Manager's Office or the designated representative per EM&C's Emergency Call-Out Procedure. See attached procedure.

C. Action to be Taken by EM&C Manager's Office

Dispatch Company personnel to evaluate and begin containment and cleanup.

D. Action to be Taken by Environmental Services Department

Report oil spill to regulatory agencies if necessary.

E. Containment and Removal of Discharged Oil and Contaminated Debris

- 1. All catch basins or drainage structures will be temporarily bermed or dammed to prevent oil from entering established watercourses or municipal drainage and sewer systems.
- Sorbent materials such as Fibrelite, absorbent pads, hay, sawdust, or sand shall be applied to the discharge area to absorb and contain the oil.
- 3. If Company personnel and equipment cannot contain the discharge or it gets beyond the fenced area or if the magnitude of the discharge is such that additional manpower, equipment, or materials are required, contact Environmental Emergency Services Company at (800) 334-0004.
- 4. Company personnel and/or Environmental Emergency Services Company shall completely clean up, remove, and dispose of oil and contaminated materials, Sorbent materials, pumping equipment, front-end loaders, dump trucks, and other equipment deemed necessary shall be made available on an emergency priority basis to effect the cleanup process.
- 5. Sorbent materials, oil-soaked soil and gravel, and other contaminated debris will be moved to an authorized solid waste landfill. Contact Environmental Services for a manifest number.
- 6. Removal of waterborne oil and contaminated waste will be accomplished by Landscape Services or an approved contractor. Contaminated materials are to be disposed of in accordance with State of Oregon DEQ regulations.

F. Follow-Up Report

- 1. EM&C will prepare a complete report for the Environmental Services Department for subsequent submission to the U.S. Environmental Protection Agency and the State of Oregon Department of Environmental Quality if required. The report shall outline circumstances of the discharge, notification of appropriate Company and governmental agency personnel, containment procedures, removal and cleanup procedures, and final waste disposal procedures. This report will be filed no later than seven days following the oil discharge incident.
- 2. The certifying engineer will review and make appropriate amendments to the SPCC Plan in accordance with 40 CFR Part 112.5.

PORTLAND GENERAL ELECTRIC COMPANY

OIL SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

REVISIONS

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REFERENCES

(ATTACHMENT E)

- 1) EM&C Oil Spill Cleanup Procedure
- 2) System Load Dispatch Oil/PCB Discharge
- 3) Portland General Electric Oil Spill Report Form (1058)
- 4) PGE Report For Transporting Electrical Equipment Or Material Form (0080)

RECEIVED

FEB 0 7 1997.

D. M. NORTON

TO:

Al Alexanderson Grieg Anderson ES-071-97

ENV 10

Dave Carboneau
Peggy Fowler
Wayne Lei
Wayne Mays
Fred Miller
Dennis Norton
Greg Rife
Jill Sughrue

FROM:

Rick Hess <

Bruce Trout

DATE:

February 3, 1997

SUBJECT:

SUPERFUND AND OTHER CLEANUP EFFORTS BY PGE - QUARTERLY

UPDATE

SEE ATTACHED

FOR PGE USE ONLY

SUPERFUND AND OTHER CLEANUP EFFORTS

STATUS REPORT

January 31, 1997

Updated or revised information is shown in bold.

BACKGROUND

PGE has been involved with the investigation and cleanup of several old spill sites, commonly called Superfund sites. The Oregon Department of Environmental Quality (DEQ) and the Environmental Protection Agency (EPA) have rules that require the cleanup of these sites. The most common contaminant of concern is PCB in the soil. The PCBs are in the soil as a result of spillage of oils containing PCBs during the dismantling of transformers and other electrical equipment. The salvaged transformers were purchased primarily from electric utilities.

This report will also describe cleanup of PCB at several PGE properties.

PGE is currently involved with the investigation and/or cleanup of the following sites:

STRANDLEY/MANNING SITE

LOCATION: Near Purdy, WA (NW of Tacoma)

PGE Superfund site involvement since 1984

Estimated cost of cleanup: \$9,000,000

PGE share of cleanup cost: 3.1 % (\$248,000)

STATUS:

The disposal of 6,000 cubic yards of PCB contaminated soil stored on site was completed in November 1993. Studies dealing with defining the extent of contamination remaining in a creek that is on site have been completed. Final remedial action plans will be based on this and other data collected at the site.

Two of the responsible parties have settled with the utility group for a total of approximately \$1.2 million dollars.

The utility group has settled with the site operator's insurance company for \$1,600,000. This settlement will reduce the cost of cleanup paid by the utility group.

Page 5

Status: Approximately 100 gallons of transformer oil leaked from a low voltage bushing into the ground under the transformer. The leak probably started after the transformer was installed in 1987. The oil contained 35 ppm PCB. The extent of soil contamination is not easily determined because the transformer is located in the middle of a lumber mill. All of the adjacent soil, up to 100 feet or more from the transformer, is covered with asphalt, concrete or equipment. There is no apparent threat to human health or the environment. The transformer was replaced. A cleanup of the soil is not feasible at this time. The lumber company does not want to disrupt the lumber mill operation to do a cleanup. No cleanup will be conducted until the use of the land changes.

A letter of understanding is being prepared for PGE and Willamina Lumber to address the oil remaining in the soil under the transformer and the lumber mill.

Komatsu Site

A padmounted transformer located at the Komatsu site in Hillsboro was damaged at this construction site by an unknown source. hole was made in the cooling fin. Approximately 210 gallons of transformer oil with no detectable PCB leaked into the soil under and around the transformer. For the convenience of the contractors, the cleanup of the oil was scheduled for a Sunday when the shutdown of the transformer would least affect the plant construction. On the Saturday before the cleanup, a subcontractor dug trenches near the transformer. These trenches filled with rain water and transformer oil. The subcontractor pumped the oil and water onto another part of the construction site creating a larger cleanup area. A subcontractor cleaned up the area contaminated by the pumping operation. PGE removed 100 cubic yards of contaminated soil from under and adjacent to the transformer. The costs of cleanup will be billed to the subcontractor.

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PORTLAND GENERAL ELECTRIC COMPANY

121 S. W. Salmon
Portland, Oregon 97204

IF A SPILL HAS OCCURRED, PROCEED TO ATTACHMENT "C" FOR IMMEDIATE ACTIONS

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN

Implementation Date of Plan: 10/09/1985

Site Plan For: Harborton Storage Yard

Latest Revision Date for Plan: 07/28/1997

This Plan is being fully implemented under PGE management approval and direction. The Plan is subject to amendment as site conditions, legislation, and prevention technology require. Current copies of this Plan must be kept readily available. (40 CFR Sections 112.3 & 112.5 (1996))

HARBORTON STORAGE YARD SPCC PLAN

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2.0	Oil Storage 2
3.0	Secondary Containment System 5
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7.0	Amendment of SPCC Plan 6
8.0	Spill History at the Facility 6
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Α.	Site Plan
В.	List of Typical Containers (Varies)
С.	Oil Spill Contingency Plan
D.	Revisions
Ε.	References
F.	Definition of a Spill Event

HARBORTON STORAGE YARD SPCC PLAN

Spill Prevention Control and Countermeasure (SPCC) Plan CERTIFICATION FORM "A"

Facility

Portland General Electric Company Oregon City Headquarters 209 Warner Milne Rd. Oregon City, Oregon 97045 (503) 650-1405

Management Approval:

I certify that I have authority to commit the necessary resources and approve plans required to carry out this Spill Prevention Control and Countermeasure (SPCC) Plan. (40 CFR Part 112.7(a))

Signature Lorge & Nouve

Name <u>George Normine</u>

Title <u>General Manager EMFC</u>

HARBORTON STORAGE YARD SPCC PLAN

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN CERTIFICATION FORM "B"

Facility:	
	Portland General Electric Company
	Harborton Storage Yard
•	12430 St. Helens Road
	Portland, Oregon
	(503) 650-1405 (Repair Desk Oregon City)
Owner:	
	Portland General Electric Company
	121 SW Salmon St
	Portland, OR 97204
	(503) 464-8521 (Environmental Services Dept.)
Implementation	Date: 10/09/1985
•	
Certification:	
0010111	\cdot
I hereby certi	fy that I have examined these facilities and, being familiar
	sions of 40 CFR, Part 112, attest that the SPCC Plan has been
	cordance with good engineering practices. (40 CFR Section
112.3(d))	columnee with good engineering practices. (40 crk bection
112.3 (d))	
	Signature Walliam E. Jawson
ED DOOCS	Signature author Of author
AFRED FROM SO	
STOINE	NameWilliam E. Lawson
9682 4	
	Professional Engineer Registration No. <u>9682</u>
alliame Jawas	
OREGOS'	State <u>Oregon</u>
1 /4/4 19/	
The second	DateJuly 28, 1997
E LAND	
12/21/98	
12/21/98	

1.0 GENERAL INFORMATION ABOUT THE FACILITY

1.1 LOCATION OF THE FACILITY

A map of the facility is shown in Attachment A.

1.2 PROXIMITY TO NAVIGABLE WATER

The Harborton Storage Yard is located approximately 300 feet from the Willamette River. A dike separates the Storage Yard form the river which is "navigable waters". The surface runoff is drained from the site to a ditch west of the yard that flows northerly 3,000 feet to the Multnomah Channel. Runoff normally percolates into the soil.

1.3 TOPOGRAPHY AND SOIL CONDITIONS OF THE SITE

The Storage Yard is lightly sloped to the west with many level and pocketed areas within the yard. In reference to Soil Survey, Multnomah County, Oregon by the U.S. Soil Conservation Service, the soil in the site is basically urban land, mostly altered during development. Original soils were gravelly loam, silt loam, or silty clay loam with some sandy material. Drainage, permeability, and runoff flow are not known, The Storage Yard is protected from erosion by 8 inch thick 3/4 inch minus crushed rock. Oil spill penetration into the soil is estimated to be one to two feet before cleanup operations are undertaken.

1.4 PHYSICAL DIMENSIONS OF THE SITE

The is enclosed by a standard industrial type metal chainlink fence approximately 540 feet by 950 feet with a total area of 11.8 acres and within the irrgular shape property area totalling 64 acres.

2.0 OIL AND OIL STORAGE AT THE FACILITY

(40 CFR Part 112.2)

2.1 PHYSICAL PROPERTIES OF OIL AND CONTAINMENT VESSELS

2.1.1 Oil Used in Electrical Equipment

The oil stored at the facility is a low-toxic petroleum base insulating oil with a specific weight of 6.882 pounds per gallon and a specific gravity of 0.920. The minimum flash point is 145°C using American Standards of Testing and Measurement (ASTM) Test D-92. The maximum SUS viscosity of the oil using ASTM Tests D-445 and D-88 is as follows:

@100°C	3.0/36 sec
@ 40°C	12.0/66 sec
@ 0°C	76.0/350 sec

The containment vessels of concern containing the above oil are lectrical equipment such as pole mounted transformers, pad mounted transformers, regulators, tanks, and other oil filled electrical equipment and tanks. The individual container capacity (gallons), failure flow-rate (maximums gallons per minute), and fail-safe engineering features very depending on the type and size of these oil fill electrical units. Electrical units stored in the yard areas are not energized. Thus, these units will not spill oil as a result of an electrical fault in the unit.

Should oil spill result from an accident, the oil would flow into the sandy soil. A small volume of spilled oil (approximately 20 to 30 gallons) would be contained in the the sandy soil. Larger volumes of spilled oil (above 25 gallons) that exceed the capacity of the soil would reach ground water.

Several substation type transformers are stored in this section of the yard. A sand berm is used as containment in the east section of the storage yard area.

2.1.2 Oil Filled Electrical Equipment

Other pole mounted transformers are stored on the north side of the service center yard. These units are not energized. Thus, these units will not spill oil as a result of an electrical fault. Should a unit be broken open, the oil will spill out in the direction of a catch basin in the yard.

Transformers and other oil filled equipment with the known level of PCB in the oil are not stored in the yard area. When small leaking oil filled units are shipped to this site, they are placed in bags and placed in a pan. A plastic cover is

Page 2 of 6

placed over the units to protect against rain.

However, should a unit be dropped or punctured, any spilled oil is immediately cleanup. The direction of flow from the transformer storage areas is shown in Attachment A.

Large pad mounted transformers are stored on the grounds of the storage area yard. These units are not energized. Thus, these units will not spill oil as a result of an electrical fault. Should a unit be broken open, the oil will spill out in a downward direction into the yard soil. See Attachment "A".

2.1.3 Storage Tanks

Several storage tanks are in service at the storage yard and contain transformer oil. The oil is the same as described in section 2.1 above.

The skid tanks are steel structures which are designed to be loaded on to trucks for transport to substations under maintenance. Each tank contains up to 10,000 gallons of transformer oil.

2.2 POTENTIAL CAUSES FOR OIL OR FUEL DISCHARGES

This SPCC Plan addresses the control of all oil and fuel discharges from routine discharge cases. Catastrophic failure, although a very rare occurrence, produces the worst-case condition in terms of quantity of hydrocarbons released and the extent of environmental pollution possible.

The probable causes of a spill during routine operations or a catastrophic failure include:

2.2.1 Routine Operations

Small oil discharges can occur should the equipment be damaged while moving units from one area to another or loading an electrical oil filled unit onto or off of a truck. A fueling nozzles malfunction or an oil transfer hose failure can also be a source of a fuel or oil spill.

-Spills From Equipment or Tanks - Oil loss during transfer operations or moving the containers resulting from dropping a unit will be approximately 5 to 50 gallons. Upon noticing the discharge or spill, the maintenance or operation crew will initiate cleanup operation in accordance with the Oil Spill Contingency Plan (see Attachment C).

-Operation - Transformer brought in from the field for repair or disposal may have oil leaks. These leaking transformers are placed into steel trays. The leaking part is sealed by maintenance crews. Any contaminated

Page 3 of 6

HARBORTON STORAGE YARD SPCC PLAN

material will be removed and disposed of at a stateapproved landfill.

2.2.2 <u>Catastrophic Failure</u>

Catastrophic failure of vessels containing oil is an unusual occurrence. Vessel failure is generally caused by dropping the unit or puncturing the vessel. Vandalism or acts of sabotage may also result in catastrophic tank failure.

-Transformers - Up to two-thirds of the oil may be discharged from a transformer because of catastrophic failure. Approximately 70 percent of the discharge occurs immediately. If tank failure does not occur, minor oil discharges may result from oil leaking from defective gaskets or punctures in the container.

-Tanks - Containment is provided for the volume of the largest tank in the containment area. Should a valve be broken or opened as an act of vandalism or sabotage, the containment will hold the contents of the largest unit.

2.3 METHOD OF DETECTING OIL DISCHARGES

The Harborton Storage Yard is an unmanned site. Routine patrol of the site is conducted during off hours. Visual inspection provides detection at all locations. Incidental leaks and small spills will be handled by trained maintenance crews. Large spills will activate the Oil Spill Contingency Plan (Attachment C).

3.0 SECONDARY CONTAINMENT SYSTEM (40 CFR Section 112.7(c))

This site has minimal oil spill containment sand berms installed in the east stoage yard to protect against the unlikely event of an oil spill. The containment structures are designed to stop spilled oil from entering the surface water of nearby wet lands. The west yard is not equipped with oil spill containment. See Attachment A.

4.0 <u>CLEANUP PROCEDURES</u> (40 CFR Section 112.7(e)(2)(x))

The Oil Spill Contingency Plan (see Attachment C) will be activated in the event of an oil discharge. The procedures used to control, stop the flow and remove the oil are given in this plan.

5.0 SITE SECURITY AND CONTROL (40 CFR Section 112.7(e)(9))

An 8-foot high metal security fence with gates surrounds the facility (see Attachment A). The gates are kept locked at all times except when PGE personnel are on the premises. PGE personnel regularly inspect the facility.

In the unlikely event of a spill, additional security of off-site areas affected by a spill will be established by operations personnel using barrier tape, traffic cones, etc. to designate the exclusion zone.

6.0 PERSONNEL TRAINING AND COMMUNICATION (40 CFR Section 112.7(e)(10))

Briefings for operations personnel are scheduled regularly to keep them informed of current oil-spill control techniques, sorbent materials, containment materials, protective clothing, equipment, etc. Current SPCC Plan requirements and pollution control laws, rules, and regulations are also included in these briefings.

Periodic information training sessions are held for division and other employees who might be involved in oil containment and cleanup operations.

The training program outlines steps to be followed in alerting various company departments, governmental agencies, and cleanup personnel. Further information is provided in the attached Contingency Plan (see Attachment C) and references (see Attachment E).

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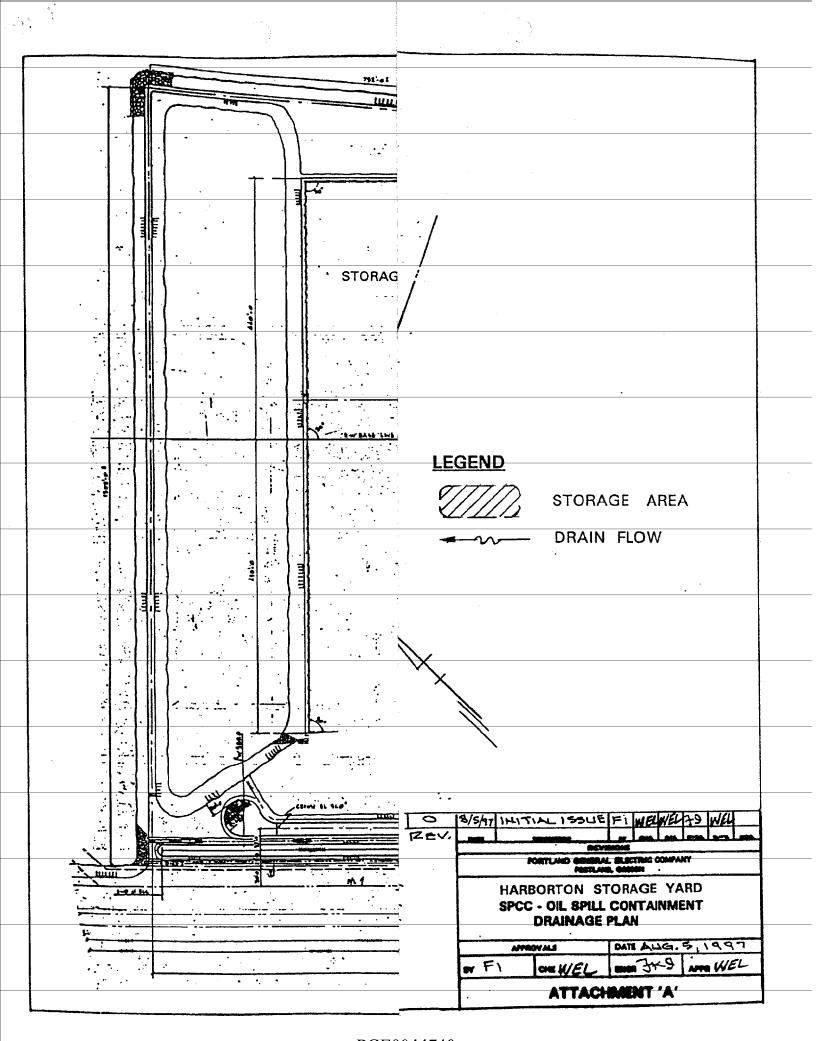
HARBORTON STORAGE YARD SPCC PLAN

7.0 AMENDMENT OF SPCC (40 CFR Section 112.5)

This plan shall be reviewed and evaluated at least once every three years from the date of management approval. In addition, any change in facility design, construction, operations or maintenance which affects the facility's potential for the discharge of oil into state waters or navigable waters should be indicated by revision to the plan within six months of such change. All such reviews, evaluations and revisions to this plan shall be documented on Attachment D.

8.0 SPILL HISTORY AT THE FACILITY (40 CFR Section 112.7(a))

	Date	Volume Spilled	Cause and Cleanup	
	05/03/97	Volume Spilled Small amounts	Cause and Cleanup The spills are removed using sorbent material.	
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ATTACHMENT B

HARBURTON	STURAGE	TARD

Number of Units	Number of Containers Per Unit	Equipment Unit Type	Volume Range of Oil/container (Gallons) (*See Note 1)	Description of Tank Design and Construction
 0700405	V455 NO			
STORAGE (Within secur	YARD NO rity fence and ala			
 6	1	Transformers	3800 to 2700	Rectangular and/or oval steel tank
3	1	Transformers	2400 to 2100	Rectangular and/or oval steel tank
4	1	Transformers	1600 to 1100	Rectangular and/or oval steel tank
 1	1	Transformer	700	Rectangular and/or oval steel tank
10	1	Regulators	800 to 500	Rectangular steel tank
5	1	Regulators	180	Rectangular steel tank
1	3	ОСВ	2000/tank	3 tanks/unit with circular steel case
2	3	осв	200/tank to	3 tanks/unit with circular steel case
 5	1	ОСВ	70/tank 45	Circular steel case
1	· 1	Tank	800	Circular steel tank 4' dia. X 9' long
1	1	Tank	11000	Circular fiberglass tank 10' dia. X 20' high
1	1	Tank	700	Circular fiberglass tank 4' dia. X 8' long
150	1	Drum	55	55 gallon steel drum
STORARA (Within secu	GE YARD NO) <u>.2</u>		·
 3	1	Transformers	6700 to 6000	Rectangular and/or oval steel tank
4	1	Transformers	4800 to 4100	Rectangular and/or oval steel tank
2	1	Transformers	3700 to 1800	Rectangular and/or oval steel tank
3	1	Transformers	1100 to 800	. Rectangular and/or oval steel tank
1	1	Tank	7000	Trailer tanker
 1	1	Tank	7000	Circular steel tank 8' dia. X 20' long
1	1	Tank	10000	Circular steel tank 8' dia. X 30' long
10	1	Drum	55	55 gallon steel drum

HARBORTON	STORAC	GE YARD (c	continued)		
STORAGE Y (Within security f		<u>3</u>			
1	1	Tank	10000	Circular steel tank 8' dia. X	30' long
				·	
STORAGE Y (Within the steel					
41	1	Drum	55	55 gallon drum (contain dry	product)
			·		
NOTES:					
			contain varying amounts	s of oil.	
2. Inventory or ev	quipmont nate	u was periorite	au August 1,1997.		
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			V.	•	
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(ATTACHMENT C) OIL SPILL CONTINGENCY PLAN (40 CFR Section 112.7(d)(1))

A copy of the Contingency Plan is kept on file at the Harborton Storage Yard at two locations shown on Attachment "A". In addition to this Contingency Plan, procedural guides outlining the steps to be followed in the reporting of any oil discharge to the System Control Center are conspicuously attached to an inside wall of the transformer shop bulletin board.

A copy of the plan is on file with the Environmental Services Department and the original copy is kept on record in the System Engineering Department. Additionally, the Facilities Department is supplied a copy of the SPCC Plan.

A procedural guide is also kept at the Repair Desk outlining the steps to be taken by that office in notifying the Landscape Services Department.

In the event an oil discharge occurs at this site, the following contingency plan will immediately be initiated.

A. Immediate Action to be Taken if Company Personnel Are on Site

- 1. Make every reasonable effort to stop or retard the flow of oil from the container with manpower, equipment, and materials on site or otherwise immediately available.
- 2. Notify the System Control Center at 464-8343 of the following conditions:
 - a. The facility name.
 - b. Location.
 - c. Equipment from which the oil discharge originated.
 - d. An approximation of direction and quantity of flow.
 - e. Required time of response.

B. Action to be Taken by System Control Center Upon Notification of Oil Discharge

The System Control Center will immediately notify the Environmental Services Department and the Harborton Storage Yard Manager's office or the designated representative per Harborton Storage Yard's Emergency Call-Out Procedure. See References Attachment E Section 1 for the PGE Oil Spill Cleanup Procedure.

C. Action to be Taken by Harborton Storage Yard Manager's Office
Dispatch Company personnel to evaluate and begin containment and cleanup.

- D. Action to be Taken by Environmental Services Department
 Report oil spill to regulatory agencies if necessary.
- E. <u>Containment and Removal of Discharged Oil and Contaminated Debris</u>

 1. All catch basins or drainage structures will be temporarily
 - bermed or dammed to prevent oil from entering established watercourses or municipal drainage and sewer systems.
 - 2. Sorbent materials such as Fibrelite, absorbent pads, hay, sawdust, or sand shall be applied to the discharge area to absorb and contain the oil.
 - 3. If Company personnel and equipment cannot contain the discharge or it gets beyond the fenced area or if the magnitude of the discharge is such that additional manpower, equipment, or materials are required, contact Environmental Emergency Services Company at (800) 334-0004.
 - 4. Company personnel and/or Environmental Emergency Services
 Company shall completely clean up, remove, and dispose of oil
 and contaminated materials, sorbent materials, pumping
 equipment, front-end loaders, dump trucks, and other equipment
 deemed necessary shall be made available on an emergency
 priority basis to effect the cleanup process.
 - 5. Sorbent materials, oil-soaked soil and gravel, and other contaminated debris will be moved to an authorized solid waste landfill. Contact Environmental Services for a manifest number.
 - 6. Removal of waterborne oil and contaminated waste will be accomplished by Landscape Services or an approved contractor.

 Contaminated materials are to be disposed of in accordance with State of Oregon Department of Environmental Quality regulations.

F. Follow-Up Report

- 1. Environmental Services will prepare a complete report for the Environmental Services Department for subsequent submission to the U.S. Environmental Protection Agency and the State of Oregon Department of Environmental Quality if required. The report shall outline circumstances of the discharge, notification of appropriate Company and governmental agency personnel, containment procedures, removal and cleanup procedures, and final waste disposal procedures. This report will be filed following the oil discharge incident.
- 2. The certifying engineer will review and make appropriate amendments to the SPCC Plan in accordance with 40 CFR Part 112.5.

HARBORTON STORAGE SITE SPCC PLAN

(ATTACHMENT D)

OIL SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN FOR

Revisions						
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CLIDA	ENICP	DATE	DV	DESCRIPTION	СНК	APPR

REFERENCES (ATTACHMENT E)

1) PGE's Oil Spill Cleanup Procedure 2) System Load Dispatch Oil/PCB Discharge 3) Portland General Electric Oil Spill Report - Form (1058) 4) PGE Report For Transporting Electrical Equipment Or Material - Form (0080) 5) Emergency Response Plan Information (See Training Program)

(ATTACHMENT F)

DEFINITION OF SPILL EVENT:

THE FOLLOWING SPILL IS NOT A "SPILL EVENT" per Federal Regulations

- A spill that occurs on PGE's property AND
- PGE's personnel are aware of it
- Occurs on surfaces impervious to the substance spilled AND
- Is fully contained

AND

Is completely cleaned up with no further incident.

IF ANY OF THE ABOVE DO NOT APPLY ANY OF THE FOLLOWING IS A "SPILL EVENT":

- SPILLED OIL WHICH ENTERS OR THREATENS WATERS in harmful quantities (sufficient to cause a film, iridescent appearance or discoloration of surface or shoreline of waters or cause sludge or oily deposits, oil with any quantity of PCBs) ...
- OR GREATER THAN 42 GALLONS OF SPILLED OIL that does not threaten to enter waters of the State of Oregon or analygable waters.
- OR SPILLED OIL WITH A PCB CONCENTRATION GREATER THAN 50 ppm that involves grazing land, vegetable gardens, surface water, sewers, ground water or drinking water
- OR SPILLED OIL WITH GREATER THAN ONE POUND OF PCBs (for example an approximate 2600 gallon spill of oil containing 50 ppm PCBs)
- OR A HAZARDOUS MATERIAL RELEASE in such quantities that facility personnel cannot contain it on PGE's property and outside assistance is required to prevent or mitigate a release of reportable quantities (as defined in 40 CFR 302) to the environment.

Portland General Electric Company

121 SW Salmon Portland OR 97204

IF A SPILL HAS OCCURRED,
PROCEED TO ATTACHMENT "C" FOR
IMMEDIATE ACTIONS

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Implementation Date of Plan: October 9, 1985

Last Plan Review Date: February 23, 1999

Site Plan For: HARBORTON SUBSTATION

This Plan is being fully implemented under Portland General Electric's management approval and direction. The Plan is subject to amendment when there is a change in facility design, construction, operation or maintenance and as site conditions, legislation, and prevention technology require. Current copies of this Plan must be readily available. (40 CFR Sections 112.3 & 112.5 (1994))

HARBORTON SUBSTATION SPCC - PLAN

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC) CERTIFICATION FORM "A"

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Various Substation Properties

Portland General Electric Company 121 S.W. Salmon St. Portland, OR 97204 (503) 464-8820

Management Approval:

I certify that I have authority to commit the necessary resources and approve plans required to carry out this Spill Prevention Control and Countermeasure Plan.

Signature

Name

Dennis Lahmers

Title

Manager, EM&C

HARBORTON SUBSTATION SPCC PLAN

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN CERTIFICATION FORM "B"

Facility:

Portland General Electric Company

Harborton Substation 12500 NW Marina Way

Portland, Oregon

(503) 650-1405 (Dispatch Desk Oregon City)

Owner:

Portland General Electric Company

121 SW Salmon Street Portland, OR 97204

(503) 464-8521 (Environmental Services Dept.)

Λ

Implementation Date: 10/9/1985

Certification:

I hereby certify that I have examined these facilities and, being familiar with the provisions of 40 CFR, Part 112, attest that the SPCC Plan has been prepared in accordance with good engineering practices. (40 CFR Part 112.3(d))

	Signature William & Tauram
STATE PROFICE	Name William E. Lawson
9682 1	Professional Engineer Registration No. 9682
William E Jawron	State Oregon
WILLIAM E. LAWSON	Date February 23, 1999
12/3//00	

1.0 GENERAL INFORMATION ABOUT THE FACILITY

1.1 LOCATION OF THE FACILITY

A regional and local map of the facility is shown in Attachment A.

1.2 PROXIMITY TO NAVIGABLE WATER

The Harborton Substation is located approximately 300 feet from the Willamette River. A dike separates the substation from the river. The surface runoff is drained from the site to a ditch west of the yard that flows northerly 3,000 feet to the Multnomah Channel. Runoff normally percolates into the soil.

1.3 TOPOGRAPHY AND SOIL CONDITION OF THE SITE

The substation yard is lightly sloped to the west with many level and pocketed areas within the yard. In reference to Soil Survey, Multnomah County, Oregon by the U.S. Soil Conservation Service, the soil in the site is basically urban land, mostly altered during development. Original soils were gravelly loam, silt loam, or silty clay loam with some sandy material. Drainage, permeability, and runoff flow are not known. The substation yard is protected from erosion by 8 inch thick 3/4-inch minus crushed rock. Oil spill penetration into the soil is estimated to be 12 inches to 24 inches before cleanup operations are undertaken.

1.4 PHYSICAL DIMENSIONS OF THE SITE

The substation yard is enclosed by a standard industrial type metal chainlink fence approximately 540 feet by 950 feet with a total area of 11.8 acres and within the irregular shape property area totaling 64 acres.

HARBORTON SUBSTATION SPCC PLAN

2.0 OIL AND OIL STORAGE AT THE FACILITY (40 CFR Part 112.7(c))

2.1 PHYSICAL PROPERTIES OF OIL AND CONTAINMENT VESSELS

The oil stored at the facility is a low-toxic petroleum base insulating oil with a specific weight of 7.28 pounds per gallon and a specific gravity of 0.874. The minimum flash point is 145 C using American Standards of Testing and Measurement (ASTM) Test D-92. The maximum SUS viscosity of the oil using ASTM Tests D-445 and D-88 is as follows:

The containment vessels of concern are pole mounted transformers (station transformers), pad mounted transformers, oil circuit beakers, regulators and other oil filled electrical equipment. The individual container capacity (gallons), failure flow-rate (maximums gallons per minute), and fail-safe engineering features very depending on the type and size of the unit. See Attachment B.

Units in the substation yard are energized. Thus, these units may spill oil as a result of an electrical fault in the unit. Should a unit be dropped or punctured during maintenance operations, spilled oil is immediately cleanup.

The direction of flow from the containers are shown in Attachment A.

2.2 POTENTIAL CAUSES FOR OIL DISCHARGES

This SPCC Plan addresses the control of all oil discharges from routine discharge cases. Catastrophic failure, although a very rare occurrence, produces the worst-case condition in terms of quantity of oil released and the extent of environmental pollution possible.

The probable causes of routine operations and catastrophic failure include:

2.2.1 Routine Operations

Small oil discharges can occur should the equipment be damaged while moving or loading the equipment onto a truck for shipment. Transformer oil could be spilled during equipment servicing and maintenance operations at this substation.

Spills From Servicing Equipment - Oil loss during filling or emptying of the container will be approximately 25 gallons before shutoff can occur, if hose-fitting failure occurs. Upon noticing the discharge or spill, the maintenance crew or operator

Page 2 of 5

HARBORTON SUBSTATION SPCC PLAN

will close the container valve and shut down the pump. Cleanup operation, in accordance with the Oil Spill Contingency Plan (see Attachment C), will be initiated.

Operation - Cooling radiators and other equipment through which oil flows can develop leaks, PGE's good housekeeping practices require that the ground under such leaks be cleaned up and protected from further contamination and that the leaking part be repaired by maintenance crews. Any contaminated material will be removed and disposed of at a state-approved landfill.

2.2.2 Catastrophic Failure

Catastrophic failure of vessels containing oil is an unusual occurrence. Vessel failure is generally caused by internal pressure buildup resulting from electric arcing deep in the vessel. This occurs faster than relief valves can reduce the pressure. The result is tank rupture. Vandalism or acts of sabotage may also result in catastrophic tank failure.

- Transformers Up to two-thirds of the oil may be discharged from a transformer because of catastrophic failure. Approximately 70 percent of the discharge occurs immediately. If tank failure does not occur, minor oil discharges may result from oil leaking from defective gaskets or punctures in the container.
- Circuit Breakers Catastrophic failure of these devices may cause most of the oil to discharge immediately, If tank failure does not occur, venting could release minor amounts of oil.
- Oil Switches and Miscellaneous Vessels Catastrophic failure of these items may cause the entire contents to be discharged immediately; however, these items have a volume generally less than 50 gallons.

2.3 METHOD OF DETECTING OIL DISCHARGES

Incidental leaks, drips and small spills will be noted during regular maintenance checks. If a failure occurs at a transmission or distribution substation, PGE System Control Center (SCC) is notified promptly of the failure by outage reports from customers. Emergency maintenance crews are dispatched immediately to the substation. If the emergency maintenance crew see oil spilled on site they will notify SCC of the event. Large spills will activate the Oil Spill Contingency Plan (Attachment C).

HARBORTON SUBSTATION SPCC PLAN

3.0 SECONDARY CONTAINMENT SYSTEM

(40 CFR Part 112.7(c))

This site is not equipped with any oil spill containment to protect against the unlikely event of an oil spill. The storm water flows to the ground or into a nearby storm drain ditch located out side the fenced area. This storm drain ditch flows into the Willamette River. The substation yard area is covered with six to eight inches of one inch minus crushed rock. See Attachment A.

4.0 CLEANUP PROCEDURES

(40 CFR Part (e)(2)(x))

The Oil Spill Contingency Plan (see Attachment C) will be activated in the event of an oil discharge. The procedures used to control, stop the flow and remove the oil are given in this plan. A spill kit is on site which contains tools, personal protective products, sorbant materials and forms for documenting a spill event.

5.0 SITE SECURITY AND CONTROL

(40 CFR Part 112.7(e)(9))

An 8-foot high metal security fence with gates surrounds the facility (see Attachment A). The gates are kept locked at all times except when PGE personnel are on the premises. PGE personnel regularly inspect the facility.

In the unlikely event of a spill, additional security of off-site areas affected by a spill will be established by operations personnel using barrier tape in the cleanup kit, traffic cones, etc. to designate the exclusion zone.

6.0 PERSONNEL TRAINING AND COMMUNICATION

(40 CFR Part 112.7(e)(10))

Briefings for operations personnel are scheduled regularly to keep them informed of current oil-spill control techniques, sorbant materials, containment materials, protective clothing, equipment, etc. Current SPCC Plan requirements and pollution control laws, rules, and regulations are also included in these briefings.

Periodic information training sessions are held for division and other employees who might be involved in oil containment and cleanup operations.

The training program outlines steps to be followed in alerting various Company departments, governmental agencies, and cleanup personnel. Further information is provided in the attached Contingency Plan (see Attachment C) and references (see Attachment E).

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HARBORTON SUBSTATION SPCC PLAN

7.0 INSPECTION AND RECORDS (40 CFR Part 112.5)

This plan shall be reviewed and evaluated at least once every three years from the date of management approval. In addition, any change in facility design, construction, operation, or maintenance which affects the facility's potential for the discharge of oil into navigable waters should be indicated by revision to the plan within six months of such change. The Engineer shall review site modifications and additions. The SPCC Plan shall be reviewed, updated and signed by the Engineer and Owner's Manager as required in (40 CFR Sections 112.3 & 112.5 (1996)).

All modifications to the existing facility and its structures or to the areas exterior to the site which do not modify drainage shall be noted on Attachment D. Replacement of non-oil filled equipment or removal of oil filled equipment.

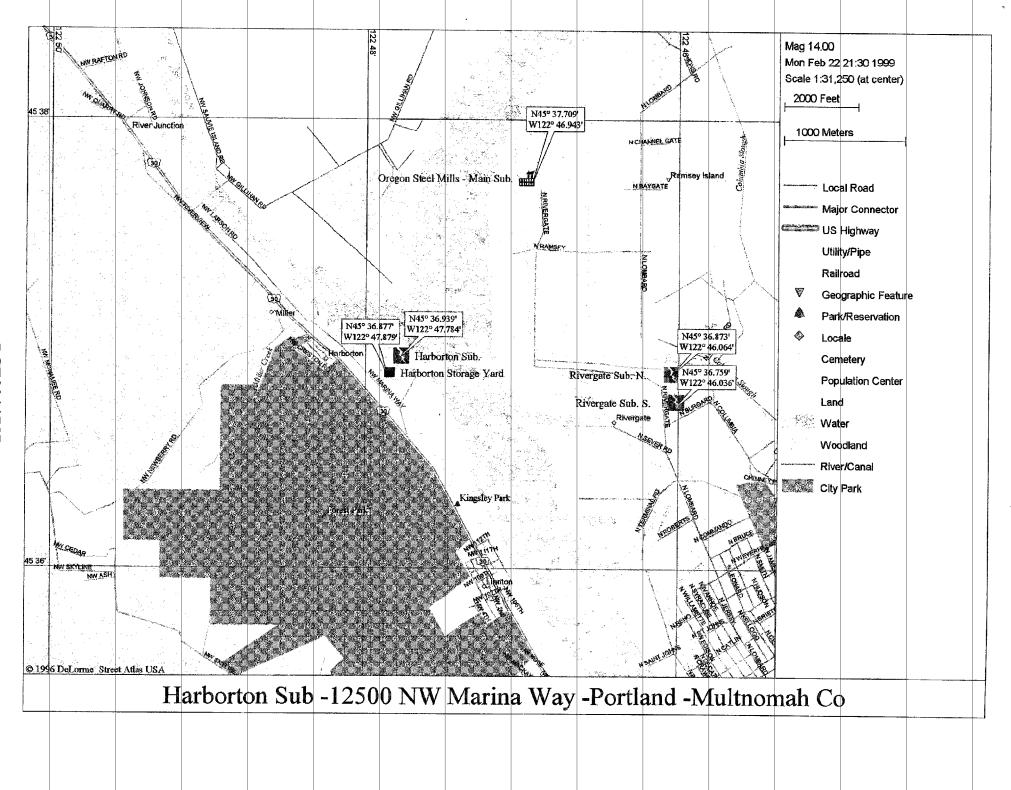
8.0 SPILL HISTORY AT THE FACILITY (40 CFR Part 112.7(a))

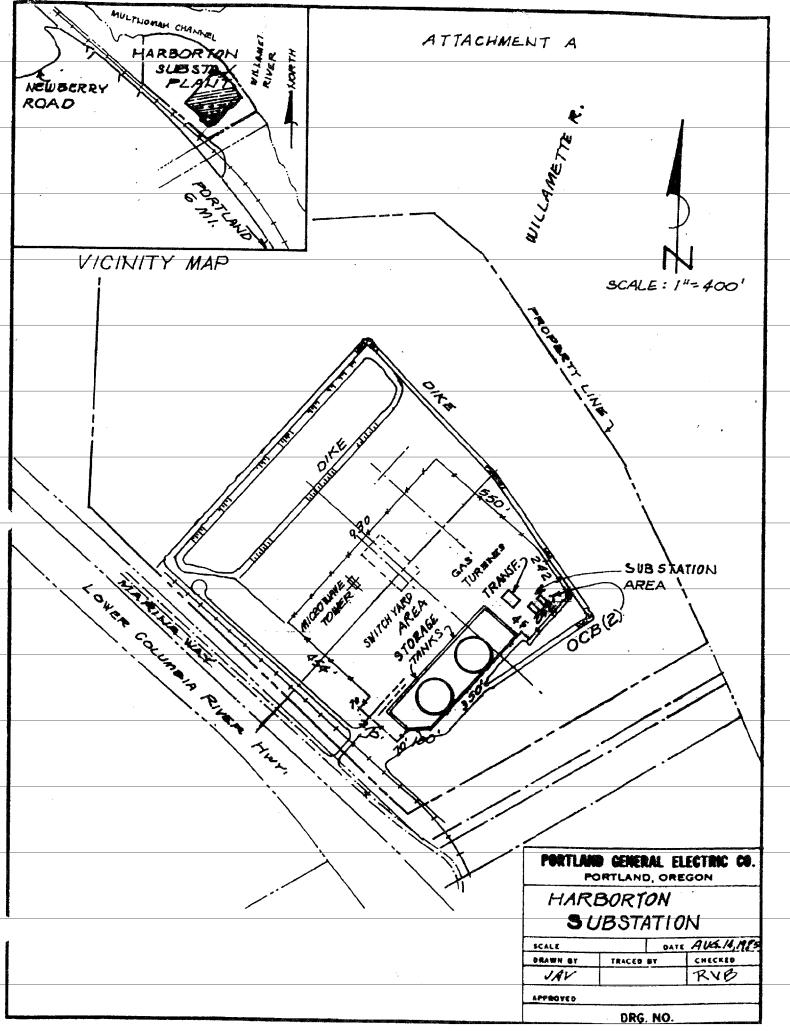
NOTES:

Record minor and major oil spills at this facility.

Date	Volume Spilled	Cause and Cleanup	
			<u>.</u>
			-

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Number of Number of Equipment Unit Type oil /container Rate from Container (Gallons) Container (gpm) 2 1 OIL BRKR DIST 55 10 Circular steel tank w/round steel top 2 flat bottom. 2 D x 2.5 H 1 1 OIL BRKR DIST 76 10 Rectangular steel tank w/skid mtd. base 2.5 x 5 x 7 H 1 1 TRANSFMR LTC 6483 575 Rectangular steel tank w/flat plate base. 6 x 14 x 13 H	HARBORTON EA
steel top & flat bottom. 2°D x 2.5° H 1 1 O!L BRKR DIST 76 10 Rectangular steel tank w/skid Went Pi mtd. base 2.5° x 5° x 7°H 1 1 TRANSFMR LTC 6483 575 Rectangular steel tank w/flat Pressur plate base. 6° x 14° x 13° H Valve	
mtd. base 2.5' x 5' x 7'H 1 1 TRANSFMR LTC 6483 575 Rectangular ateel tank w/flat Pressur plate base. 6' x 14' x 13'H Valve	e
plate base. 6' x 14' x 13'H Valve	e
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Note: Containers of less than 40 gal. capacity may not be listed.	

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		REMARK : OIL BRKR	NO LAB	SELS ON I	SDO-15-500 BUSHINGS. #* SDO-15-500 10-84. **OH'	SE-3B	36467-2				1200	55	1			4853			00
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(ATTACHMENT C) OIL SPILL CONTINGENCY PLAN (40 CFR Part 112.7(d)(1))

A copy of the Contingency Plan is kept on file at the Control House at the location shown on Attachment"A" and at EM&C Headquarters. In addition to this Contingency Plan, procedural guides outlining the steps to be followed in reporting any oil discharge to the System Control Center are conspicuously

A copy of this plan is on file with the Environmental Services Department and the original copy is kept on record in the System Engineering Department.

Additionally, the System Control Center is supplied a copy of the SPCC Plan.

A procedural guide is also kept at the Repair Desk outlining the steps to be taken by that office in notifying the Landscape Services Department should oil spill beyond the substation fencing.

In the event an oil discharge occurs at this site, the following contingency plan will immediately be initiated.

A. Immediate Action to be Taken if Company Personnel Are on Site

- 1. Make every reasonable effort to stop or retard the flow of oil from the container with manpower, equipment, and materials on site or otherwise immediately available.
- 2. Notify the System Control Center at 464-8343 of the following conditions:
 - a. The facility name.

attached to an inside wall of the Control House.

- b. Location.
- c. Equipment from which the oil discharge originated.
- d. An approximation of direction and quantity of flow.
- e. Required time of response.

B. Action to be Taken by System Control Center Upon Notification of Oil Discharge

The System Control Center will immediately notify the Environmental Services Department and EM&CHeadquarter's Dispatch Desk or the designated representative perEM&C's Emergency Call-Out Procedure. See References Attachment E Section 1 for the PGE Oil Spill Cleanup Procedure.

- C. Action to be Taken by the EM&C Manager's Office

 Dispatch Company personnel to evaluate and begin containment and cleanup.
- D. Action to be Taken by Environmental Services Department
 Report oil spill to regulatory agencies if necessary.

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HARBORTON SUBSTATION SPCC PLAN

- E. Containment and Removal of Discharged Oil and Contaminated Debris
 - 1. All catch basins or drainage structures will be temporarily bermed or dammed to prevent oil from entering established watercourses or municipal drainage and sewer systems.
 - 2. Sorbent materials such as Fibrelite, absorbent pads, hay, sawdust, or sand shall be applied to the discharge area to absorb and contain the oil.
 - 3. If Company personnel and equipment cannot contain the discharge or it gets beyond the fenced area or if the magnitude of the discharge is such that additional manpower, equipment, or materials are required, contact Environmental Emergency Services Company at (800) 334-0004.
 - 4. Company personnel and/or Environmental Emergency Services Company shall completely clean up, remove, and dispose of oil and contaminated materials, sorbent materials, pumping equipment, front-end loaders, dump trucks, and other equipment deemed necessary shall be made available on an emergency priority basis to effect the cleanup process.
 - 5. Sorbent materials, oil-soaked soil and gravel, and other contaminated debris will be moved to an authorized solid waste landfill. Contact Environmental Services for a manifest number.
 - 6. Removal of waterborne oil and contaminated waste will be accompshed EM&C Crews and/or Landscape Services or an approved contractor. Contaminated materials are to be disposed of in accordance with Sta Oregon Department of Environmental Quality regulations.

F. Follow-Up Report

- 1. Environmental Services will prepare a complete report for the Environmental Services Department for subsequent submission to the Environmental Protection Agency and the State of Oregon Department Environmental Quality if required. The report shall outline circumstances of the discharge, notification of appropriate Company governmental agency personnel, containment procedures, removal and cleanup procedures, and final waste disposal procedures. This repowill be filed following the oil discharge incident.
- 2. The certifying engineer will review and make appropriate amendments the SPCC Plan in accordance with 40 CFR Part 112.5.

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HARBORTON SUBSTATION SPCC PLAN

ATTACHMENT D

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HARBORTON SUBSTATION SPCC PLAN

(ATTACHMENT E) REFERENCES

SECTIONS:	
1)	PGE's Oil Spill Cleanup Procedure
2)	System Load Dispatch Oil/PCB Discharge
3)	Portland General Electric Oil Spill Report - Form (1058)
4)	PGE Report For Transporting Electrical Equipment Or Material - Form (0080)
5)	Emergency Response Plan Information (See Training Program)
	•

(ATTACHMENT F)

THE FOLLOWING SPILL IS NOT A "SPILL EVENT" per Federal Regulations

- A spill that occurs on PGE's property AND
- PGE's personnel are aware of it
 AND
- Occurs on surfaces impervious to the substance spilled AND
- Is fully contained
 AND
- Is completely cleaned up with no further incident.

IF ANY OF THE ABOVE DO NOT APPLY ANY OF THE FOLLOWING IS A "SPILL EVENT":

- SPILLED OIL WHICH ENTERS OR THREATENS WATERS in harmful quantities (sufficient to cause a film, iridescent appearance or discoloration of surface or shoreline of waters or cause sludge or oily deposits, oil with any quantity of PCBs)
- OR GREATER THAN 42 GALLONS OF SPILLED OIL that does not threaten to enter waters of the State of Oregon or "navigable waters"
- OR SPILLED OIL WITH A PCB CONCENTRATION GREATER THAN 50 ppm that involves grazing land, vegetable gardens, surface water, sewers, ground water or drinking water
- OR SPILLED OIL WITH GREATER THAN ONE POUND OF PCBs (for example an approximate 2600 gallon spill of oil containing 50 ppm PCBs)
- OR A HAZARDOUS MATERIAL RELEASE in such quantities that facility personnel cannot contain it on PGE's property and outside assistance is required to prevent or mitigate a release of reportable quantities (as defined in 40 CFR 302) to the environment.

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HARBORTON SUBSTATION SPCC PLAN

ATTACHMENT G

INSPECTIONS, TESTS, AND RECORDS

Site specific information acquired by Portland General Electric personnel pertaining to site inspections, electrical equipment inspections, sample data, chain of custody, lab test results, maintenance records and specifications on oil filled electrical equipment is on file with EM&C at the Oregon City Office.

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PORTLAND GENERAL ELECTRIC COMPANY

121 S. W. Salmon Portland, Oregon 97204

IF A SPILL HAS OCCURRED,
PROCEED TO ATTACHMENT "C" FOR
IMMEDIATE ACTIONS

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN

Implementation Date of Plan: 10/09/1985

Site Plan For: Harborton Storage Yard

Latest Revision Date for Plan: 07/20/2000

This Plan is being fully implemented under PGE management approval and direction. The Plan is subject to amendment as site conditions, legislation, and prevention technology require. Current copies of this Plan must be kept readily available. (40 CFR Sections 112.3 & 112.5 (1999))

HARBORTON STORAGE YARD SPCC PLAN

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	6.0	Personnel Training	5
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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC) CERTIFICATION FORM "A"

Various Substation Properties

Portland General Electric Company 121 S.W. Salmon St. Portland, OR 97204 (503) 464-8820

Management Approval:

I certify that I have authority to commit the necessary resources and approve plans required to carry out this Spill Prevention Control and Countermeasure Plan.

Signature

Name <u>Dennis Lahmers</u>

Title <u>Manager, EM&C</u>

HARBORTON STORAGE YARD SPCC PLAN

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN CERTIFICATION FORM "B"

Facility:	
	Portland General Electric Company
	Harborton Storage Yard
	12430 St. Helens Road
	Portland, Oregon
	(503) 650-1405 (Repair Desk Oregon City)
Owner:	
	Portland General Electric Company
	121 SW Salmon St
	Portland, OR 97204
•	(503) 464-8521 (Environmental Services Dept.)
Certification	<u> </u>
I hereby cert	ify that I have examined these facilities and, being familiar isions of 40 CFR, Part 112, attest that the SPCC Plan has been accordance with good engineering practices. (40 CFR Section
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I hereby cert with the prov prepared in a	Signature William E. Lawson Professional Engineer Registration No. 9682
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I hereby cert with the prov prepared in a 112.3(d))	ify that I have examined these facilities and, being familiar isions of 40 CFR, Part 112, attest that the SPCC Plan has been accordance with good engineering practices. (40 CFR Section Signature William E. Lawson Professional Engineer Registration No. 9682 State Oregon
I hereby cert with the prov prepared in a 112.3(d))	Signature William E. Lawson Professional Engineer Registration No. 9682
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1.0 GENERAL INFORMATION ABOUT THE FACILITY

1.1 LOCATION OF THE FACILITY

A map of the facility is shown in Attachment A.

1.2 PROXIMITY TO NAVIGABLE WATER

The Harborton Storage Yard is located approximately 300 feet from the Willamette River. A dike separates the Storage Yard form the river which is "navigable waters". The surface runoff is drained from the site to a ditch west of the yard that flows northerly 3,000 feet to the Multnomah Channel. Runoff normally percolates into the soil.

1.3 TOPOGRAPHY AND SOIL CONDITIONS OF THE SITE

The Storage Yard is lightly sloped to the west with many level and pocketed areas within the yard. In reference to Soil Survey, Multnomah County, Oregon by the U.S. Soil Conservation Service, the soil in the site is basically urban land, mostly altered during development. Original soils were gravelly loam, silt loam, or silty clay loam with some sandy material. Drainage, permeability, and runoff flow are not known, The Storage Yard is protected from erosion by 8 inch thick 3/4 inch minus crushed rock. Oil spill penetration into the soil is estimated to be one to two feet before cleanup operations are undertaken.

1.4 PHYSICAL DIMENSIONS OF THE SITE

The is enclosed by a standard industrial type metal chainlink fence approximately 540 feet by 950 feet with a total area of 11.8 acres and within the irrgular shape property area totalling 64 acres.

2.0 OIL AND OIL STORAGE AT THE FACILITY

(40 CFR Part 112.2)

2.1 PHYSICAL PROPERTIES OF OIL AND CONTAINMENT VESSELS

2.1.1 Oil Used in Electrical Equipment

The oil stored at the facility is a low-toxic petroleum base insulating oil with a specific weight of 6.882 pounds per gallon and a specific gravity of 0.920. The minimum flash point is 145°C using American Standards of Testing and Measurement (ASTM) Test D-92. The maximum SUS viscosity of the oil using ASTM Tests D-445 and D-88 is as follows:

@1	00°C.							3.0/36 sec
<u>a</u>	40°C.							12.0/66 sec
a	O°C.	_		 				76.0/350 sec

The containment vessels of concern containing the above oil are lectrical equipment such as pole mounted transformers, pad mounted transformers, regulators, tanks, and other oil filled electrical equipment and tanks. The individual container capacity (gallons), failure flow-rate (maximums gallons per minute), and fail-safe engineering features very depending on the type and size of these oil fill electrical units. Electrical units stored in the yard areas are not energized. Thus, these units will not spill oil as a result of an electrical fault in the unit.

Should oil spill result from an accident, the oil would flow into the sandy soil. A small volume of spilled oil (approximately 20 to 30 gallons) would be contained in the the sandy soil. Larger volumes of spilled oil (above 25 gallons) that exceed the capacity of the soil would reach ground water.

Several substation type transformers are stored in this section of the yard. A sand berm is used as containment in the east section of the storage yard area.

2.1.2 Oil Filled Electrical Equipment

Other pole mounted transformers are stored on the north side of the service center yard. These units are not energized. Thus, these units will not spill oil as a result of an electrical fault. Should a unit be broken open, the oil will spill out in the direction of a catch basin in the yard.

Transformers and other oil filled equipment with the known level of PCB in the oil are not stored in the yard area. When small leaking oil filled units are shipped to this site, they are placed in bags and placed in a pan. A plastic cover is

HARBORTON STORAGE YARD SPCC PLAN

placed over the units to protect against rain.

However, should a unit be dropped or punctured, any spilled oil is immediately cleanup. The direction of flow from the transformer storage areas is shown in Attachment A.

Large pad mounted transformers are stored on the grounds of the storage area yard. These units are not energized. Thus, these units will not spill oil as a result of an electrical fault. Should a unit be broken open, the oil will spill out in a downward direction into the yard soil. See Attachment "A".

2.1.3 Storage Tanks

Several storage tanks are in service at the storage yard and contain transformer oil. The oil is the same as described in section 2.1 above.

The skid tanks are steel structures which are designed to be loaded on to trucks for transport to substations under maintenance. Each tank contains up to 10,000 gallons of transformer oil.

2.2 POTENTIAL CAUSES FOR OIL OR FUEL DISCHARGES

This SPCC Plan addresses the control of all oil and fuel discharges from routine discharge cases. Catastrophic failure, although a very rare occurrence, produces the worst-case condition in terms of quantity of hydrocarbons released and the extent of environmental pollution possible.

The probable causes of a spill during routine operations or a catastrophic failure include:

2.2.1 Routine Operations

Small oil discharges can occur should the equipment be damaged while moving units from one area to another or loading an electrical oil filled unit onto or off of a truck. A fueling nozzles malfunction or an oil transfer hose failure can also be a source of a fuel or oil spill.

-Spills From Equipment or Tanks - Oil loss during transfer operations or moving the containers resulting from dropping a unit will be approximately 5 to 50 gallons. Upon noticing the discharge or spill, the maintenance or operation crew will initiate cleanup operation in accordance with the Oil Spill Contingency Plan (see Attachment C).

-Operation - Transformer brought in from the field for repair or disposal may have oil leaks. These leaking transformers are placed into steel trays. The leaking part is sealed by maintenance crews. Any contaminated

Page 3 of 6

HARBORTON STORAGE YARD SPCC PLAN

material will be removed and disposed of at a stateapproved landfill.

2.2.2 <u>Catastrophic Failure</u>

Catastrophic failure of vessels containing oil is an unusual occurrence. Vessel failure is generally caused by dropping the unit or puncturing the vessel. Vandalism or acts of sabotage may also result in catastrophic tank failure.

-Transformers - Up to two-thirds of the oil may be discharged from a transformer because of catastrophic failure. Approximately 70 percent of the discharge occurs immediately. If tank failure does not occur, minor oil discharges may result from oil leaking from defective gaskets or punctures in the container.

-Tanks - Containment is provided for the volume of the largest tank in the containment area. Should a valve be broken or opened as an act of vandalism or sabotage, the containment will hold the contents of the largest unit.

2.3 METHOD OF DETECTING OIL DISCHARGES

The Harborton Storage Yard is an unmanned site. Routine patrol of the site is conducted during off hours. Visual inspection provides detection at all locations. Incidental leaks and small spills will be handled by trained maintenance crews. Large spills will activate the Oil Spill Contingency Plan (Attachment C).

3.0 SECONDARY CONTAINMENT SYSTEM

(40 CFR Section 112.7(c))

This site has minimal oil spill containment sand berms installed in the east stoage yard to protect against the unlikely event of an oil spill. The containment structures are designed to stop spilled oil from entering the surface water of nearby wet lands. The west yard is not equipped with oil spill containment. See Attachment A.

4.0 <u>CLEANUP PROCEDURES</u>

(40 CFR Section 112.7(e)(2)(x))

The Oil Spill Contingency Plan (see Attachment C) will be activated in the event of an oil discharge. The procedures used to control, stop the flow and remove the oil are given in this plan.

5.0 SITE SECURITY AND CONTROL

(40 CFR Section 112.7(e)(9))

An 8-foot high metal security fence with gates surrounds the facility (see Attachment A). The gates are kept locked at all times except when PGE personnel are on the premises. PGE personnel regularly inspect the facility.

In the unlikely event of a spill, additional security of off-site areas affected by a spill will be established by operations personnel using barrier tape, traffic cones, etc. to designate the exclusion zone.

6.0 PERSONNEL TRAINING AND COMMUNICATION

(40 CFR Section 112.7(e)(10))

Briefings for operations personnel are scheduled regularly to keep them informed of current oil-spill control techniques, sorbent materials, containment materials, protective clothing, equipment, etc. Current SPCC Plan requirements and pollution control laws, rules, and regulations are also included in these briefings.

Periodic information training sessions are held for division and other employees who might be involved in oil containment and cleanup operations.

The training program outlines steps to be followed in alerting various company departments, governmental agencies, and cleanup personnel. Further information is provided in the attached Contingency Plan (see Attachment C) and references (see Attachment E).

HARBORTON STORAGE YARD SPCC PLAN

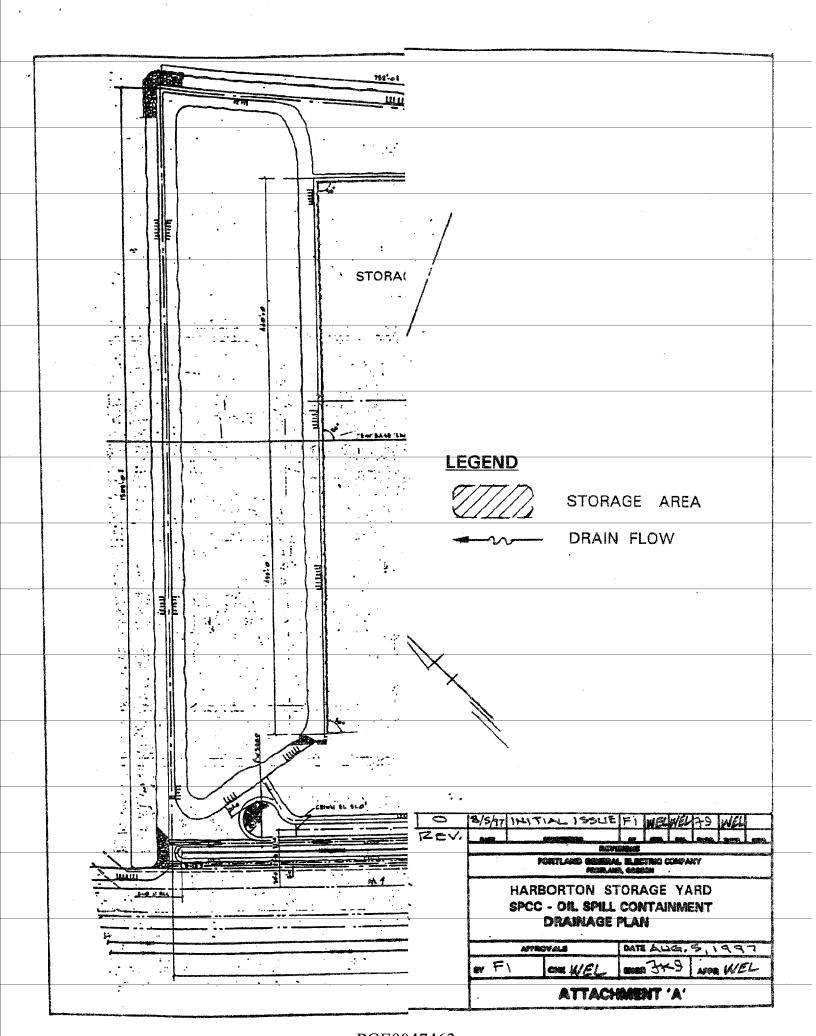
7.0 AMENDMENT OF SPCC (40 CFR Section 112.5)

This plan shall be reviewed and evaluated at least once every three years from the date of management approval. In addition, any change in facility design, construction, operations or maintenance which affects the facility's potential for the discharge of oil into state waters or navigable waters should be indicated by revision to the plan within six months of such change. All such reviews, evaluations and revisions to this plan shall be documented on Attachment D.

8.0 SPILL HISTORY AT THE FACILITY (40 CFR Section 112.7(a))

Date	Volume Spilled	Cause and Cleanup
05/03/97	Small amounts	The spills are removed using sorbent material.
		·

Page 6 of 6



PGE0047463

ATTACHMENT B

HARBORTON STORAGE YARD

	Number of Units	Number of Containers Per Unit	Equipment Unit Type	Volume Range of Oil/container (Gallons) (*See Note 1)	Description of Tank Design and Construction
	STORAGE (Within securi	YARD NO.			•
	6	1	Transformers	3800 to 2700	Rectangular and/or oval steel tank
	3	1	Transformers	2400 to 2100	Rectangular and/or oval steel tank
	4	1	Transformers	1600 to 1100	Rectangular and/or oval steel tank
	1	1	Transformer	700	Rectangular and/or oval steel tank
	10	1	Regulators	800 to 500	Rectangular steel tank
	5	1	Regulators	180	Rectangular steel tank
	1	3	OCB	2000/tank	3 tanks/unit with circular steel case
	2	3	OCB	200/tank to	3 tanks/unit with circular steel case
	5	1	OCB	70/tank 45	Circular steel case
	1	. 1	Tank	800	Circular steel tank 4' dia. X 9' long
	1	11	Tank	11000	Circular fiberglass tank 10' dia. X 20' high
	1	1 .	Tank	700	Circular fiberglass tank 4' dia. X 8' long
	150	1	Drum	55	55 galion steel drum
	STORARA (Within securit	SE YARD NO. ry fence)	2		
	3	1	Transformers	6700 to 6000	Rectangular and/or oval steel tank
	4	1	Transformers	4800 to 4100	Rectangular and/or oval steel tank
	2 .	1	Transformers	3700 to 1800	Rectangular and/or oval steel tank
	3	1	Transformers	1100 to 800	Rectangular and/or oval steel tank
	1	1	Tank	7000	Trailer tanker
•	1	1	Tank	7000	Circular steel tank 8' dia. X 20' long
	1	1	Tank	10000	Circular steel tank 8' dia. X 30' long
	10	1	Drum	55	55 gailon steel drum

		ATTA	ACHMENT B	
HARBORTO	N STORAG	E YARD (d	continued)	
STORAGE (Within security		<u>3</u>		
1	1	Tank	10000	Circular steel tank 8' dia. X 30' long
	YARD NO.4			
(Within the stee	el tank structure) 1	Drum	55	55 gallon drum (contain dry product)
NOTES:				
1. * Denotes lis			contain varying amounts	of oil.
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(ATTACHMENT C)

OIL SPILL CONTINGENCY PLAN

(40 CFR Section 112.7(d)(1))

A copy of the Contingency Plan is kept on file at the Harborton Storage Yard at two locations shown on Attachment "A". In addition to this Contingency Plan, procedural guides outlining the steps to be followed in the reporting of any oil discharge to the System Control Center are conspicuously attached to an inside wall of the transformer shop bulletin board.

A copy of the plan is on file with the Environmental Services Department and the original copy is kept on record in the System Engineering Department. Additionally, the Facilities Department is supplied a copy of the SPCC Plan.

A procedural guide is also kept at the Repair Desk outlining the steps to be taken by that office in notifying the Landscape Services Department.

In the event an oil discharge occurs at this site, the following contingency plan will immediately be initiated.

A. Immediate Action to be Taken if Company Personnel Are on Site

- 1. Make every reasonable effort to stop or retard the flow of oil from the container with manpower, equipment, and materials on site or otherwise immediately available.
- Notify the System Control Center at 464-8343 of the following conditions:
 - a. The facility name.
 - b. Location.
 - c. Equipment from which the oil discharge originated.
 - d. An approximation of direction and quantity of flow.
 - e. Required time of response.

B. Action to be Taken by System Control Center Upon Notification of Oil Discharge

The System Control Center will immediately notify the Environmental Services Department and the Harborton Storage Yard Manager's office or the designated representative per Harborton Storage Yard's Emergency Call-Out Procedure. See References Attachment E Section 1 for the PGE Oil Spill Cleanup Procedure.

C. Action to be Taken by Harborton Storage Yard Manager's Office
Dispatch Company personnel to evaluate and begin containment and cleanup.

D. Action to be Taken by Environmental Services Department
Report oil spill to regulatory agencies if necessary.

E. Containment and Removal of Discharged Oil and Contaminated Debris

- 1. All catch basins or drainage structures will be temporarily bermed or dammed to prevent oil from entering established watercourses or municipal drainage and sewer systems.
- 2. Sorbent materials such as Fibrelite, absorbent pads, hay, sawdust, or sand shall be applied to the discharge area to absorb and contain the oil.
- 3. If Company personnel and equipment cannot contain the discharge or it gets beyond the fenced area or if the magnitude of the discharge is such that additional manpower, equipment, or materials are required, contact Environmental Emergency Services Company at (800) 334-0004.
- 4. Company personnel and/or Environmental Emergency Services
 Company shall completely clean up, remove, and dispose of oil and contaminated materials, sorbent materials, pumping equipment, front-end loaders, dump trucks, and other equipment deemed necessary shall be made available on an emergency priority basis to effect the cleanup process.
- 5. Sorbent materials, oil-soaked soil and gravel, and other contaminated debris will be moved to an authorized solid waste landfill. Contact Environmental Services for a manifest number.
- 6. Removal of waterborne oil and contaminated waste will be accomplished by Landscape Services or an approved contractor.

 Contaminated materials are to be disposed of in accordance with State of Oregon Department of Environmental Quality regulations.

F. Follow-Up Report

- 1. Environmental Services will prepare a complete report for the Environmental Services Department for subsequent submission to the U.S. Environmental Protection Agency and the State of Oregon Department of Environmental Quality if required. The report shall outline circumstances of the discharge, notification of appropriate Company and governmental agency personnel, containment procedures, removal and cleanup procedures, and final waste disposal procedures. This report will be filed following the oil discharge incident.
- 2. The certifying engineer will review and make appropriate amendments to the SPCC Plan in accordance with 40 CFR Part 112.5.

HARBORTON STORAGE SITE SPCC PLAN

(ATTACHMENT D)

OIL SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN FOR

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REFERENCES (ATTACHMENT E)

SECTIONS

1)	PGE's Oil Spill Cleanup Procedure
2)	System Load Dispatch Oil/PCB Discharge
3)	Portland General Electric Oil Spill Report - Form (1058)
4)	PGE Report For Transporting Electrical Equipment Or Material - Form (0080)
5)	Emergency Response Plan Information (See Training Program)

(ATTACHMENT F)

DEFINITION OF SPILL EVENT:

THE FOLLOWING SPILL IS NOT A "SPILL EVENT" per Federal Regulations

- A spill that occurs on PGE's property
 AND
- PGE's personnel are aware of it
 AND
- Occurs on surfaces impervious to the substance spilled <u>AND</u>
- Is fully contained
 AND
- Is completely cleaned up with no further incident.

IF ANY OF THE ABOVE DO NOT APPLY ANY OF THE FOLLOWING IS A "SPILL EVENT":

- SPILLED OIL WHICH ENTERS OR THREATENS WATERS in harmful quantities (sufficient to cause a film, iridescent appearance or discoloration of surface or shoreline of waters or cause sludge or oily deposits, oil with any quantity of PCBs) ...
- OR GREATER THAN 42 GALLONS OF SPILLED OIL that does not threaten to enter waters of the State of Oregon or %navigable waters %
- OR SPILLED OIL WITH A PCB CONCENTRATION GREATER THAN 50 ppm that involves grazing land, vegetable gardens, surface water, sewers, ground water or drinking water
- OR <u>SPILLED OIL WITH GREATER THAN ONE POUND OF PCBs</u> (for example an approximate 2600 gallon spill of oil containing 50 ppm PCBs)
- OR A HAZARDOUS MATERIAL RELEASE in such quantities that facility personnel cannot contain it on PGE's property and outside assistance is required to prevent or mitigate a release of reportable quantities (as defined in 40 CFR 302) to the environment.

PORTLAND GENERAL ELECTRIC COMPANY

121 S. W. Salmon Portland, Oregon 97204

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN



Site: Harborton Substation

Implementation Date of Plan: 10/09/1985

Latest Review and Evaluation Date for this SPCC Plan: 02/14/2003

Last Site Inspection: 02/07/2002

Current Substation Site Inspection Date: 02/14/2003 By WEL

This Plan is being fully implemented under **Portland General Electric (PGE)** management approval and direction. The Plan is subject to review and evaluation once every five years. As a result of this review and evaluation, the owner or operator shall amend the **SPCC Plan** within six months of the review. The reviewed SPCC Plan shall include more effective prevention and control technology if: (1) Such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Current copies of this Plan must be kept readily available.

(40 CFR Parts 112.3 & 112.5 (August 16, 2002))

HARBORTON SUBSTATION SPCC PLAN

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)
CERTIFICATION FORM "A"

Various Substation Properties

Portland General Electric Company
121 SW Salmon St.
Portland, OR 97204

Management Approval:

I certify that I have authority to commit the necessary resources and approve plans required to carry out this Spill Prevention Control and Countermeasure Plan.

Signature	- Val (Nat-
Name	Dave Lamb
Title	General Manager, EM&C

HARBORTON SUBSTATION SPCC PLAN

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN CERTIFICATION FORM "B"

Fac	i	ı	i	tv	:

Portland General Electric Company

Harborton Substation 12500 NW Marina Way Portland, Oregon 97231

(503) 464-8343 (Load Dispatch)

Owner:

Portland General Electric Company

121 SW Salmon Street Portland, OR 97204

(503) 464-8524 (Environmental Services Dept.) (503) 464-8030 (Substation Engineering Dept.)

Implementation Date: 10/09/1985

Certification:

I hereby certify that I have examined these facilities and, being familiar with the provisions of 40 CFR, Part 112, attest that the **SPCC Plan** has been prepared in accordance with good engineering practices. (40 CFR Part 112.3(d))

1/22/2 OFTI PROFES	Signature William E. Jawson
HGINE	Name William E. Lawson
1/1 Viam Schurt An	Professional Engineer Registration No. 9682
OREGON	StateOregon
WILLIAM E. LAWSON	DateJanuary 22, 2002
12/31/02	

1.0 GENERAL INFORMATION ABOUT THE FACILITY

1.1 LOCATION OF THE FACILITY

A regional and local map of the facility is shown in Attachment A.

1.2 PROXIMITY TO NAVIGABLE WATER

The Harborton Substation is located approximately 300 feet from the Willamette River. A dike separates the substation from the river. The surface runoff is drained from the site to a ditch west of the yard that flows northerly 3,000 feet to the Multnomah Channel. Runoff normally percolates into the soil.

1.3 TOPOGRAPHY AND SOIL CONDITION OF THE SITE

The substation yard is lightly sloped to the west with many level and pocketed areas within the yard. In reference to Soil Survey, Multnomah County, Oregon by the U.S. Soil Conservation Service, the soil in the site is basically urban land, mostly altered during development. Original soils were gravelly loam, silt loam, or silty clay loam with some sandy material. Drainage, permeability, and runoff flow are not known. The substation yard is protected from erosion by 8 inch thick 3/4-inch minus crushed rock. Oil spill penetration into the soil is estimated to be 12 inches to 24 inches before cleanup operations are undertaken.

1.4 PHYSICAL DIMENSIONS OF THE SITE

The substation yard is enclosed by a standard industrial type metal chainlink fence approximately 540 feet by 950 feet with a total area of 11.8 acres and within the irregular shape property area totaling 64 acres.

HARBORTON SUBSTATION SPCC PLAN

2.0 OIL AND OIL STORAGE AT THE FACILITY

(40 CFR Part 112.7(c))

2.1 PHYSICAL PROPERTIES OF OIL AND CONTAINMENT VESSELS

The oil stored at the facility is a low-toxic petroleum base insulating oil with a specific weight of 7.28 pounds per gallon and a specific gravity of 0.874. The minimum flash point is 145 C using American Standards of Testing and Measurement (ASTM) Test D-92. The maximum SUS viscosity of the oil using ASTM Tests D-445 and D-88 is as follows:

The containment vessels of concern are pole mounted transformers (station transformers), pad mounted transformers, oil circuit beakers, regulators and other oil filled electrical equipment. The individual container capacity (gallons), failure flow-rate (maximums gallons per minute), and fail-safe engineering features very depending on the type and size of the unit. See Attachment B.

Units in the substation yard are energized. Thus, these units may spill oil as a result of an electrical fault in the unit. Should a unit be dropped or punctured during maintenance operations, spilled oil is immediately cleanup.

The direction of flow from the containers are shown in Attachment A.

2.2 POTENTIAL CAUSES FOR OIL DISCHARGES

This SPCC Plan addresses the control of all oil discharges from routine discharge cases. Catastrophic failure, although a very rare occurrence, produces the worst-case condition in terms of quantity of oil released and the extent of environmental pollution possible.

The probable causes of routine operations and catastrophic failure include:

2.2.1 Routine Operations

Small oil discharges can occur should the equipment be damaged while moving or loading the equipment onto a truck for shipment. Transformer oil could be spilled during equipment servicing and maintenance operations at this substation.

- Spills From Servicing Equipment - Oil loss during filling or emptying of the container will be approximately 25 gallons before shutoff can occur, if hose-fitting failure occurs. Upon noticing the discharge or spill, the maintenance crew or operator

Page 2 of 5

HARBORTON SUBSTATION SPCC PLAN

will close the container valve and shut down the pump. Cleanup operation, in accordance with the Oil Spill Contingency Plan (see Attachment C), will be initiated.

- Operation - Cooling radiators and other equipment through which oil flows can develop leaks, PGE's good housekeeping practices require that the ground under such leaks be cleaned up and protected from further contamination and that the leaking part be repaired by maintenance crews. Any contaminated material will be removed and disposed of at a state-approved landfill.

2.2.2 Catastrophic Failure

Catastrophic failure of vessels containing oil is an unusual occurrence. Vessel failure is generally caused by internal pressure buildup resulting from electric arcing deep in the vessel. This occurs faster than relief valves can reduce the pressure. The result is tank rupture. Vandalism or acts of sabotage may also result in catastrophic tank failure.

- Transformers Up to two-thirds of the oil may be discharged from a transformer because of catastrophic failure. Approximately 70 percent of the discharge occurs immediately. If tank failure does not occur, minor oil discharges may result from oil leaking from defective gaskets or punctures in the container.
- <u>Circuit Breakers</u> Catastrophic failure of these devices may cause most of the oil to discharge immediately, If tank failure does not occur, venting could release minor amounts of oil.
- Oil Switches and Miscellaneous Vessels Catastrophic failure of these items may cause the entire contents to be discharged immediately; however, these items have a volume generally less than 50 gallons.

2.3 METHOD OF DETECTING OIL DISCHARGES

Incidental leaks, drips and small spills will be noted during regular maintenance checks. If a failure occurs at a transmission or distribution substation, PGE System Control Center (SCC) is notified promptly of the failure by outage reports from customers. Emergency maintenance crews are dispatched immediately to the substation. If the emergency maintenance crew see oil spilled on site they will notify SCC of the event. Large spills will activate the Oil Spill Contingency Plan (Attachment C).

3.0 SECONDARY CONTAINMENT SYSTEM

(40 CFR Part 112.7(c))

This site is not equipped with any oil spill containment to protect against the unlikely event of an oil spill. The storm water flows to the ground or into a nearby storm drain ditch located out side the fenced area. This storm drain ditch flows into the Willamette River. The substation yard area is covered with six to eight inches of one inch minus crushed rock. See Attachment A.

4.0 CLEANUP PROCEDURES

(40 CFR Part (e)(2)(x))

The Oil Spill Contingency Plan (see Attachment C) will be activated in the event of an oil discharge. The procedures used to control, stop the flow and remove the oil are given in this plan. A spill kit is on site which contains tools, personal protective products, sorbant materials and forms for documenting a spill event.

5.0 SITE SECURITY AND CONTROL

(40 CFR Part 112.7(e)(9))

An 8-foot high metal security fence with gates surrounds the facility (see Attachment A). The gates are kept locked at all times except when PGE personnel are on the premises. PGE personnel regularly inspect the facility.

In the unlikely event of a spill, additional security of off-site areas affected by a spill will be established by operations personnel using barrier tape in the cleanup kit, traffic cones, etc. to designate the exclusion zone.

6.0 PERSONNEL TRAINING AND COMMUNICATION

(40 CFR Part 112.7(e)(10))

Briefings for operations personnel are scheduled regularly to keep them informed of current oil-spill control techniques, sorbant materials, containment materials, protective clothing, equipment, etc. Current SPCC Plan requirements and pollution control laws, rules, and regulations are also included in these briefings.

Periodic information training sessions are held for division and other employees who might be involved in oil containment and cleanup operations.

The training program outlines steps to be followed in alerting various Company departments, governmental agencies, and cleanup personnel. Further information is provided in the attached Contingency Plan (see Attachment C) and references (see Attachment E).

7.0 <u>INSPECTION AND RECORDS</u>

(40 CFR Part 112.5)

This plan shall be reviewed and evaluated at least once every three years from the date of management approval. In addition, any change in facility design, construction, operation, or maintenance which affects the facility's potential for the discharge of oil into navigable waters should be indicated by revision to the plan within six months of such change. The Engineer shall review site modifications and additions. The SPCC Plan shall be reviewed, updated and signed by the Engineer and Owner's Manager as required in (40 CFR Sections 112.3 & 112.5 (1996)).

All modifications to the existing facility and its structures or to the areas exterior to the site which do not modify drainage shall be noted on Attachment D. Replacement of non-oil filled equipment or removal of oil filled equipment.

8.0 SPILL HISTORY AT THE FACILITY

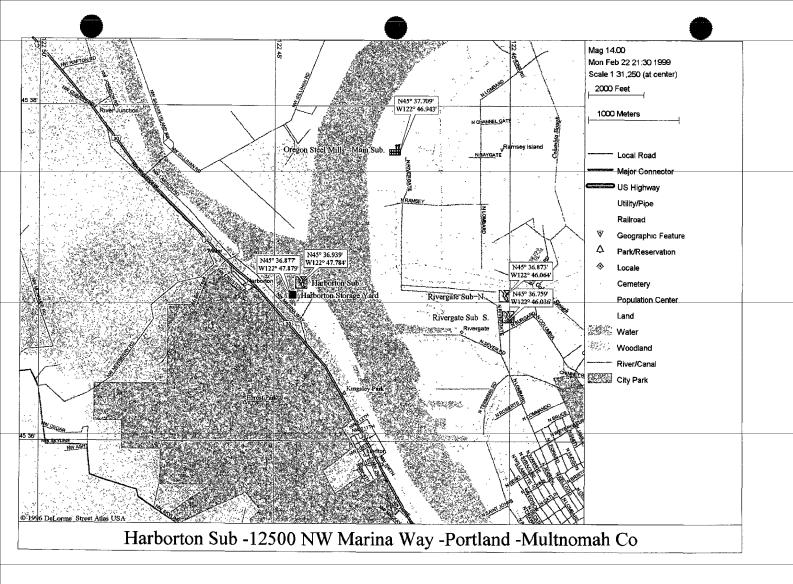
(40 CFR Part 112.7(a))

Record minor and major oil spills at this facility.

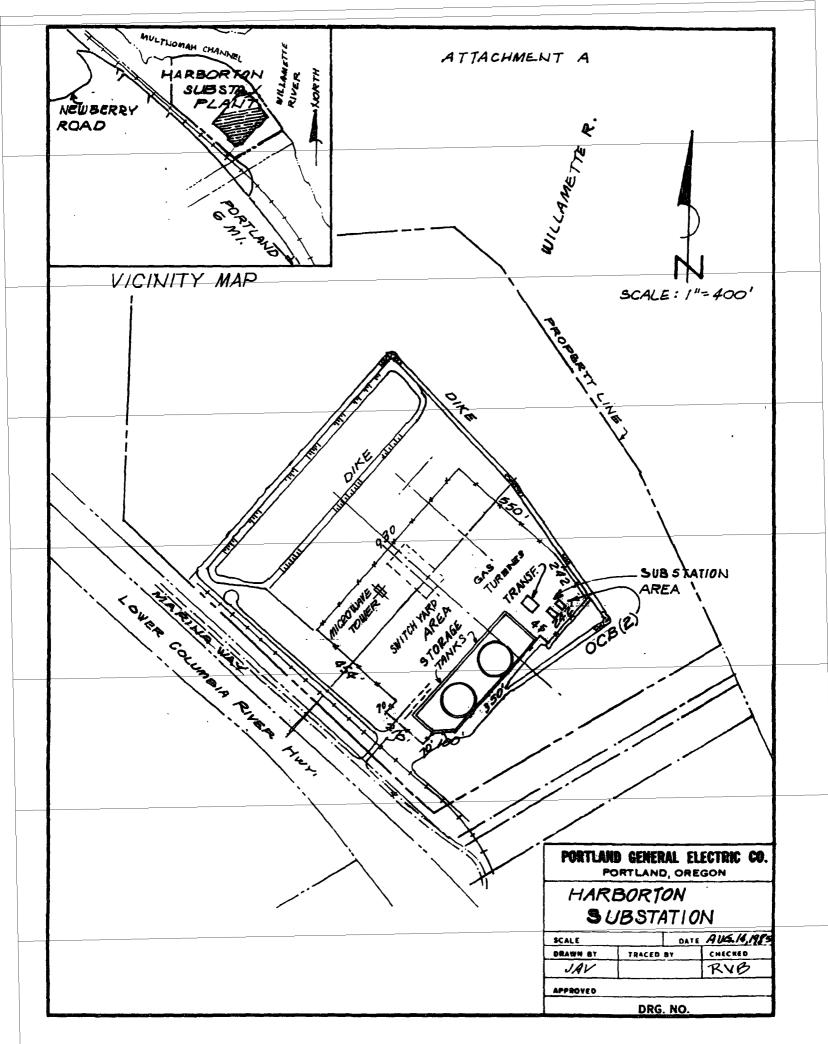
NOTES:

)			
_	Date	Volume Spilled	Cause and Cleanup	
-				
_				
-				_
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PGE0044776



HARBORTON EAST

3/23/93 ATTACHMENT B Page 1

2 1 OIL BRKR DIST 55 10 Circular steel tank w/round Vent Pipe steel top & flat bottom. 2'D x 2.5' H 1 1 OIL BRKR DIST 76 10 Rectangular steel tank w/skid Vent Pipe mtd. base 2.5' x 5' x 7'H 1 1 TRANSFMR LTC 6483 575 Rectangular steel tank w/flat Pressure Relief plate base. 6' x 14' x 13'H Valve	Number of Units	Number of Containers per Unit	unit Type	Volume of Oil /container (Gallons)	Overland Flow Rate from Container (gpm)	Description of Tank Design and Construction	Fail-Safe Engineering Features
mtd. base 2.5' x 5' x 7'H 1 1 TRANSFMR LTC 6483 575 Rectangular steel tank w/flat Pressure Relief	2	1	OIL BRKR DIST	55	10	steel top & flat bottom. 2'D x	Vent Pipe
	1	1	OIL BRKR DIST	76	10		Vent Pipe
	1	1	TRANSFMR LTC	6483	575	- · · · · · · · · · · · · · · · · · · ·	

Note: Containers of less than 40 gal. capacity may not be listed.

DIST	RICT: C	,		SU	BSATION EQUIP	MENT LISTED	BY LO	ATION				LOCATI	ON:	HARB	ORTON			
.NBR POS. ST.CD	EQUIPMENT DESC	MAN YR CD MD	EQUIPMENT	LTC/BRKR	SERTAL	FAULT		TIN			SAMP			. (PPM		PURCH	INST	ASSET
31.00	DESC	כט אט	TYPE	MECHANISM	NBR.	MVA/KA	KVA	ΚV	AMPS	OIL	DATE	TK 1	L TK a	2 TK 3	J08	ORDER	DATE	MAINT
378 U H152	OIL BRKR TRAN	MG 72	AHJ-54-115-10	OA4	20512		10000	115.0	2000	216)	2!	5 3	5 3	5544	57301		77
	REMARK : 2-16	-82 COPPE	R EXPANSIONS 2	-37-370. STU	DE CONNECTORS	1-54-830.												
79 U W162	OIL BRKR TRAN	MG 72	AHJ-54-115-10	OA4	20511		10000	115.0	2000	216)	() (0	5544	57301		TT
	REMARK : CLOS	ING COIL	M2425. 02/02/9	3 - AFTER CHA	NGING SHIMS O	N PILOT VAL	VEGO	T 5 SI	IOTS. F	OUND CE	ITER T	ANK T	MING	PLUG I	ISSING	ON TOP	HAD TO	REP
	OIL BRKR TRAN		AHJ-54-115-10		20513				2000	216			2 2	2 2		57301		TT
	REMARK : 5-20	-86 USE P.	ARTS FROM W-12	2 PER NORMINE	(SPARE BREAK	ER).~-02/09	/93 - CO	RRECTI	D PROB	MITH S	TICKY	LATCH	VALVE	REP			SURE HY	
	OIL BRKR TRAN		AHJ-54-115-10		20514				2000	216		-1				57301		ΣT
	REMARK : 10/0	L/93-INST	ALLED NEW COUN	rer							-	·						
	CON															154		
	SON															154		
048 FEB 17																134	_	AGE 126

PORTLAND GENERAL ELECTRIC COMPANY

PAGE 126 PROC: EBL (EC053)

DISTRICT: C					S	SUBSATION EQUIPMENT LISTED BY LOCATION						LOCATION: HARBORTON EAST					
CO.NBR	POS.	EQUIPMENT	MAN YR	EQUIPMENT	LTC/BRKR	SERIAL	FAULT		TIN			PCB LEVE			PURCH	INST	ASSET/
ST.	CD	DESC	CD MD	TYPE	MECHANISM	NBR.	MVA/KA	KVA	ΚV	AMPS	OIL DATE	LK T LK	2 TK 3	JOB	ORDER	DATE	MAINT
10545 U	HR3	TRANSFMR LTC REMARK : PCB	HH 72		UTT-A70/B	RDP~38974	NID NT 766C	16800		OCOLUMNED	6483	3	CAL OT.		58504	conse	DD
21242 U	R346	OIL BRKR DIST REMARK : FIEL	IT 69	14.4KS-500-12	SE-31A	41-10279-60	21	500		1200	FOR RADIATOR 76	10	GAL DIL		27606	COKES	00
21265 U	R338	OIL BRKR DIST			SE-38	E 2-16-660 TH 36467-1	KU 2-16-686		14.4	1200	55	7		4853	31903		DD
21266 U	P334	REMARK : NO L OIL BRKR DIST		BUSHINGS. ** SDO-15-500	OH'D ON 9/19. SE-3B	/96, HO # 840 36467-2	0.	10	14.4	1200	55	15		60E7	31903		DD
		REMARK : FIEL			D ON 4/14/98			10	14.4	1200	99	13		4053	31703		טט

PGE0044779

(ATTACHMENT C)

OIL SPILL CONTINGENCY PLAN

(40 CFR Part 112.7(d)(1))

A copy of the Contingency Plan is kept on file at the Control House at the location shown on Attachment"A" and at EM&C Headquarters. In addition to this Contingency Plan, procedural guides outlining the steps to be followed in reporting any oil discharge to the System Control Center are conspicuously attached to an inside wall of the Control House.

A copy of this plan is on file with the Environmental Services Department and the original copy is kept on record in the System Engineering Department. Additionally, the System Control Center is supplied a copy of the SPCC Plan.

A procedural guide is also kept at the Repair Desk outlining the steps to be taken by that office in notifying the Landscape Services Department should oil spill beyond the substation fencing.

In the event an oil discharge occurs at this site, the following contingency plan will immediately be initiated.

A. Immediate Action to be Taken if Company Personnel Are on Site

- 1. Make every reasonable effort to stop or retard the flow of oil from the container with manpower, equipment, and materials on site or otherwise immediately available.
- Notify the System Control Center at 464-8343 of the following conditions:
 - a. The facility name.
 - b. Location.
 - c. Equipment from which the oil discharge originated.
 - d. An approximation of direction and quantity of flow.
 - e. Required time of response.

B. Action to be Taken by System Control Center Upon Notification of Oil Discharge

The System Control Center will immediately notify the Environmental Services Department and EM&CHeadquarter's Dispatch Desk or the designated representative perEM&C's Emergency Call-Out Procedure. See References Attachment E Section 1 for the PGE Oil Spill Cleanup Procedure.

C. Action to be Taken by the EM&C Manager's Office

Dispatch Company personnel to evaluate and begin containment and cleanup.

D. Action to be Taken by Environmental Services Department
Report oil spill to regulatory agencies if necessary.

Page C1 of C2

E. Containment and Removal of Discharged Oil and Contaminated Debris

- 1. All catch basins or drainage structures will be temporarily bermed or dammed to prevent oil from entering established watercourses or municipal drainage and sewer systems.
- Sorbent materials such as Fibrelite, absorbent pads, hay, sawdust, or sand shall be applied to the discharge area to absorb and contain the oil.
- 3. If Company personnel and equipment cannot contain the discharge or it gets beyond the fenced area or if the magnitude of the discharge is such that additional manpower, equipment, or materials are required, contact Environmental Emergency Services Company at (800) 334-0004.
- 4. Company personnel and/or Environmental Emergency Services Company shall completely clean up, remove, and dispose of oil and contaminated materials, sorbent materials, pumping equipment, front-end loaders, dump trucks, and other equipment deemed necessary shall be made available on an emergency priority basis to effect the cleanup process.
- 5. Sorbent materials, oil-soaked soil and gravel, and other contaminated debris will be moved to an authorized solid waste landfill. Contact Environmental Services for a manifest number.
- 6. Removal of waterborne oil and contaminated waste will be accompshed EM&C Crews and/or Landscape Services or an approved contractor. Contaminated materials are to be disposed of in accordance with Sta Oregon Department of Environmental Quality regulations.

F. Follow-Up Report

- 1. Environmental Services will prepare a complete report for the Environmental Services Department for subsequent submission to the Environmental Protection Agency and the State of Oregon Department Environmental Quality if required. The report shall outline circumstances of the discharge, notification of appropriate Company governmental agency personnel, containment procedures, removal and cleanup procedures, and final waste disposal procedures. This repowill be filed following the oil discharge incident.
- 2. The certifying engineer will review and make appropriate amendments the SPCC Plan in accordance with 40 CFR Part 112.5.

Page C2 of C2

ATTACHMENT D-1

REVISIONS

SPILL PREVENTION CONTROL AND COUNTERMEASURE COMPLIANCE INSPECTION PLAN

In accordance with 40CFR Part 112.5(b), a review and evaluation of this Spill Prevention Control and Countermeasure (SPCC) Plan is conducted at least once every five years. As a result of this review and evaluation, Portland General Electric System Engineering will amend the SPCC Plan within six months of the review. The result will include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Any technical amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation, or maintenance occurrences which materially affects the facility potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

(40CFR Part 112.5 (b) & (c))

Changes to this SPCC Plan that are non-technical amendments like changes to phone number and names do not require PE certification. The following will suffice,

I have completed a review of the site and an evaluation of the SPCC Plan for the Substation on (provide the date) and will (will not) amend the Plan as a result.

Review D	ates	<u>Signature</u>	Title of Position	Amendment
(site)	(plan)			(circle one)
				will / will not
				will / will not
				will / will not
				will / will not

MANAGEMENT APPROVAL

Portland General Electric is committed to the prevention of discharges of oil in to navigable waters and the environment, and maintains the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of this SPCC Plan this Substation.

Authorized Facility Representative: William E. Lawson

on Signature: <u>[[Lilliam E. Jawawn]</u> Title: Senior Civil/Environmental Engineer

Page D1 of D2

ATTACHMENT D-2

OIL SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN FOR

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<u>Revisions</u>											
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SUPV	ENGŘ	DATE	ΒΥ	2.200	·-DES	RIPTION		The same	СНК	APPR	
1 1 1 () Lant () . () .	(13m / 1 / 1 / 1 / 1 / 1 / 1 / 1 / 1 / 1 /	10 4 T	- Jan 1981	a s Armanisma	April 1 To The Control		***	The same		Washington Co.	

Page D2 of D2

(ATTACHMENT E) REFERENCES

SECTIONS:

1)	PGE's Oil Spill Cleanup Procedure
2)	System Load Dispatch Oil/PCB Discharge
3)	Portland General Electric Oil Spill Report - Form (1058)
4)	PGE Report For Transporting Electrical Equipment Or Material - Form (0080)
5)	Emergency Response Plan Information (See Training Program)

Page E1 of E1

(ATTACHMENT F)

THE FOLLOWING SPILL IS NOT A "SPILL EVENT" per Federal Regulations

- A spill that occurs on PGE's property
 - AND
- PGE's personnel are aware of it AND
- Occurs on surfaces impervious to the substance spilled
- Is fully contained AND
- Is completely cleaned up with no further incident.

IF ANY OF THE ABOVE DO NOT APPLY

ANY OF THE FOLLOWING IS A "SPILL EVENT":

- <u>SPILLED OIL WHICH ENTERS OR THREATENS WATERS</u> in harmful quantities (sufficient to cause a film, iridescent appearance or discoloration of surface or shoreline of waters or cause sludge or oily deposits, oil with any quantity of PCBs) ...
- OR GREATER THAN 42 GALLONS OF SPILLED OIL that does not threaten to enter waters of the State of Oregon or "navigable waters"
- OR SPILLED OIL WITH A PCB CONCENTRATION GREATER THAN 50 ppm that involves grazing land, vegetable gardens, surface water, sewers, ground water or drinking water
- OR SPILLED OIL WITH GREATER THAN ONE POUND OF PCBs (for example an approximate 2600 gallon spill of oil containing 50 ppm PCBs)
- OR A HAZARDOUS MATERIAL RELEASE in such quantities that facility personnel cannot contain it on PGE's property and outside assistance is required to prevent or mitigate a release of reportable quantities (as defined in 40 CFR 302) to the environment.

Page F1 of F1

ATTACHMENT G

INSPECTIONS, TESTS, AND RECORDS

Site specific information acquired by Portland General Electric personnel pertaining to site inspections, electrical equipment inspections, sample data, chain of custody, lab test results, maintenance records and specifications on oil filled electrical equipment is on file with EM&C at the Oregon City Office.

Page G1 of G1

PORTLAND GENERAL ELECTRIC COMPANY

121 S. W. Salmon Portland, Oregon 97204

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN

IF A SPILL HAS OCCURRED, PROCEED TO ATTACHMENT "C" FOR IMMEDIATE ACTIONS

Site: Harborton Storage Yard

Implementation Date of Plan: 10/09/1985

Latest Review and Evaluation Date for this SPCC Plan: 12/15/2003

Last Site Inspection: 09/28/2001

Current Facility Site Inspection Date: 11/25/2003 By WEL

This Plan is being fully implemented under **Portland General Electric (PGE)** management approval and direction. The Plan is subject to review and evaluation once every five years. As a result of this review and evaluation, the owner or operator shall amend the **SPCC Plan** within six months of the review. The reviewed SPCC Plan shall include more effective prevention and control technology if: (1) Such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Current copies of this Plan must be kept readily available.

(40 CFR Parts 112.3 & 112.5 (August 16, 2002))

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Certificat	ion Form "B" - Engineer's Certification (iii)
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2.0	Oil Storage 2
3.0	Secondary Containment System 5
4.0	Cleanup Procedures 5
5.0	Security 5
6.0	Personnel Training 5
7.0	Amendment of SPCC Plan 6
8.0	Spill History at the Facility 6
Attachment	s
A.	Site Plan
В.	List of Typical Containers (Varies)
c.	Oil Spill Contingency Plan
D.	Revisions
Е.	References
F.	Definition of a Spill Event

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC) CERTIFICATION FORM "A"

Various Substation Properties

Portland General Electric Company 121 S.W. Salmon St. Portland, OR 97204 (503) 464-8820

Management Approval:

I certify that I have authority to commit the necessary resources and approve plans required to carry out this Spill Prevention Control and Countermeasure Plan.

Name Dennis Lahmers

Title Manager, EM&C

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN CERTIFICATION FORM "B"

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Portland General Electric Company

Harborton Storage Yard 12430 St. Helens Road

Portland, Oregon

(503) 650-1405 (Repair Desk Oregon City)

Owner:

Portland General Electric Company

121 SW Salmon St Portland, OR 97204

(503) 464-8521 (Environmental Services Dept.)

Implementation Date: 10/09/1985

Certification:

I hereby certify that I have examined these facilities and, being familiar with the provisions of 40 CFR, Part 112, attest that the SPCC Plan has been prepared in accordance with good engineering practices. (40 CFR Section 112.3(d))

STRED PROFESO LA GINE & 9682
Ulliant Lawron
14 14 19 18 CH
12/3/ 12000

Signature William L. Jawoon	_
NameWilliam E. Lawson	
Professional Engineer Registration No. <u>9682</u>	
State Oregon	
DateJuly 20, 2000	

1.0 GENERAL INFORMATION ABOUT THE FACILITY

1.1 LOCATION OF THE FACILITY

A map of the facility is shown in Attachment A.

1.2 PROXIMITY TO NAVIGABLE WATER

The Harborton Storage Yard is located approximately 300 feet from the Willamette River. A dike separates the Storage Yard form the river which is "navigable waters". The surface runoff is drained from the site to a ditch west of the yard that flows northerly 3,000 feet to the Multnomah Channel. Runoff normally percolates into the soil.

1.3 TOPOGRAPHY AND SOIL CONDITIONS OF THE SITE

The Storage Yard is lightly sloped to the west with many level and pocketed areas within the yard. In reference to Soil Survey, Multnomah County, Oregon by the U.S. Soil Conservation Service, the soil in the site is basically urban land, mostly altered during development. Original soils were gravelly loam, silt loam, or silty clay loam with some sandy material. Drainage, permeability, and runoff flow are not known, The Storage Yard is protected from erosion by 8 inch thick 3/4 inch minus crushed rock. Oil spill penetration into the soil is estimated to be one to two feet before cleanup operations are undertaken.

1.4 PHYSICAL DIMENSIONS OF THE SITE

The is enclosed by a standard industrial type metal chainlink fence approximately 540 feet by 950 feet with a total area of 11.8 acres and within the irrgular shape property area totalling 64 acres.

2.0 OIL AND OIL STORAGE AT THE FACILITY

(40 CFR Part 112.7(a)(3)(i))

2.1 PHYSICAL PROPERTIES OF OIL AND CONTAINMENT VESSELS

The oil stored at the facility is a low-toxic petroleum base insulating oil with a specific weight of 7.28 pounds per gallon and a specific gravity of 0.874. The minimum flash point is 145 C using American Standards of Testing and Measurement (ASTM) Test D-92. The maximum SUS viscosity of the oil using ASTM Tests D-445 and D-88 is as follows:

@1	00	3	0/36 sec
@	40	12.0	0/66 sec
@	Ω	76	0/350gec

The containment vessels of concern are substation transformers, oil circuit beakers, regulators and other oil filled electrical equipment. The individual container capacity (gallons), failure flow-rate (maximums gallons per minute), and fail-safe engineering features very depending on the type and size of the unit. See Attachment B.

Units in the storage yard are not energized. Thus, these units may spill oil as a result of maintenance work. Should a unit be dropped or punctured during maintenance operations, spilled oil is immediately cleaned up.

The directions of flow from the containers are shown in Attachment A.

2.2 POTENTIAL CAUSES FOR OIL DISCHARGES

This SPCC Plan addresses the control of all oil discharges from routine discharge cases. Catastrophic failure, although a very rare occurrence, produces the worst-case condition in terms of quantity of oil released and the extent of environmental pollution possible.

The probable causes of routine operations and catastrophic failure include:

2.2.1 Routine Operations

Small oil discharges can occur should the equipment be damaged while moving or loading the equipment onto a truck for shipment. Transformer oil could be spilled during equipment servicing and maintenance operations at this substation.

- Spills from servicing equipment Oil loss during filling or emptying of the container will be approximately 25 gallons before shutoff can occur, if hose-fitting failure occurs. Upon noticing the discharge or spill, the maintenance crew or operator will close the container valve and shut down the pump. Cleanup operation, in accordance with the Oil Spill Contingency Plan (see Attachment C), will be initiated.
- Operation Cooling radiators and other equipment through which oil flows can develop leaks, PGE good housekeeping

Page 2 of 5

practices require that the ground under such leaks be cleaned up and protected from further contamination and that the leaking part be repaired by maintenance crews. Any contaminated material will be removed and disposed of at a state-approved landfill.

2.2.2 Catastrophic Failure

Catastrophic failure of vessels containing oil is an unusual occurrence. Vessel failure is generally caused by internal pressure buildup resulting from electric arcing deep in the vessel. This occurs faster than relief valves can reduce the pressure. The result is tank rupture. Vandalism or acts of sabotage may also result in catastrophic tank failure. The units stored at this yard are not energized.

- Transformers Up to two-thirds of the oil may be discharged from a transformer because of catastrophic failure.

 Approximately 25 percent of the discharge can occur within minutes of an accident. If tank failure does not occur, minor oil discharges may result from oil leaking from defective gaskets or punctures in the container.
- <u>Circuit Breakers</u> Catastrophic failure of these devices may cause most of the oil to discharge within minutes of an accident. If tank failure does not occur, but the unit is dropped oil could release through the vent.
- Oil Switches and Miscellaneous Vessels Catastrophic failure of these items may cause the entire contents to be discharged immediately; however, these items have a volume generally less than 50 gallons.

2.3 METHOD OF DETECTING OIL DISCHARGES

An incidental leak, drips and small spills will be noted during regular site visits. If an oil discharge is detected, the EM&C Crew notify PGE System Control Center (SCC) promptly of the spilled oil. Emergency maintenance crews are dispatched immediately to the storage yard. If the emergency maintenance crew see oil spilled on site they will notify SCC of the event. Large spills will activate the Oil Spill Contingency Plan (Attachment C).

Page 3 of 5

3.0 SECONDARY CONTAINMENT SYSTEM

(40 CFR Part 112.3(d)(1)(v) & Part 112.7(a))

This site is not equipped with any containment system. The storm water generally seeps into the yard surface during light rainfall. During heavy rain storms, the water flows overland to the west from the storage area to an open ditch. The drainage from the ditch flows to the north into a wet land area. The wet land water empties into the Willamette River. The storage yard area is covered with four to six inches of one inch minus crushed rock. See Attachment A.

4.0 CLEANUP PROCEDURES

(40 CFR Part 112.7(a)(3)(iv))

The Oil Spill Contingency Plan (see Attachment C) will be activated in the event of an oil discharge. The procedures used to control, stop the flow and remove the oil are given in this plan. A spill kit is on site, which contains tools, personal protective products, sorbing materials and forms for documenting a spill event.

5.0 SITE SECURITY AND CONTROL

(40 CFR Part 112.7(q)(1) through (5))

An 8-foot high metal security fence with gates surrounds the facility (see Attachment A). The gates are kept locked at all times except when PGE personnel are on the premises. PGE personnel regularly inspect the facility.

In the unlikely event of a spill, operations personnel using barrier tape in the cleanup kit, traffic cones, etc. to designate the exclusion zone will establish additional security of off-site areas affected by a spill.

6.0 PERSONNEL TRAINING AND COMMUNICATION

(40 CFR Part 112.7(f)(1)&(3))

Briefings for operations personnel are scheduled regularly to keep them informed of current oil-spill control techniques, sorbing materials, containment materials, protective clothing, equipment, etc. Current SPCC Plan requirements and pollution control laws, rules, and regulations are also included in these briefings. Periodic information training sessions are held for division and other employees who might be involved in oil containment and cleanup operations.

The training program outlines steps to be followed in alerting various Company departments, governmental agencies, and cleanup personnel. Further information is provided in the attached Contingency Plan (see Attachment C) and references (see Attachment E).

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7.0 INSPECTION AND RECORDS (40 CFR Part 112.7(e))

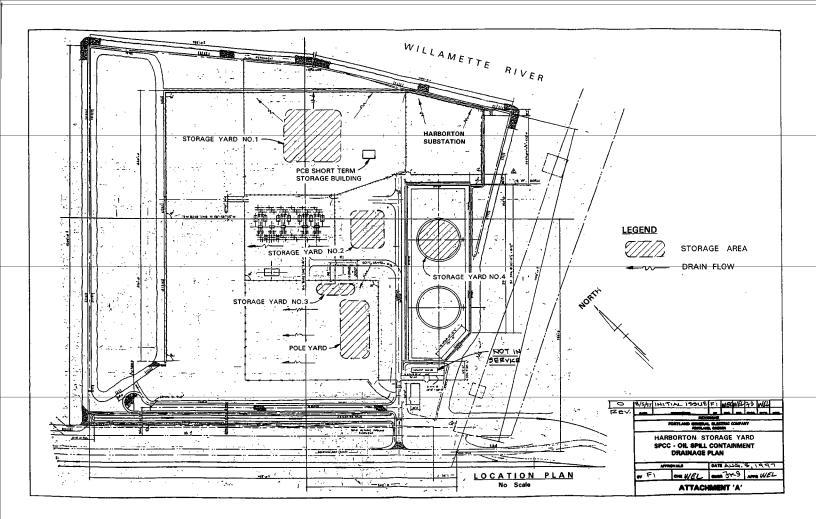
This plan shall be reviewed and evaluated at least once every five years from the date of management approval. In addition, any change in facility design, construction, operation, or maintenance which affects the facility's potential for the discharge of oil into navigable waters should be indicated by revision to the plan within six months of such change. The Engineer shall review site modifications and additions. The SPCC Plan shall be reviewed, updated and signed by the Engineer and Owner Manager as required in (40 CFR Sections 112.3 & 112.5 (August 16, 2002)).

All modifications to the existing facility and its structures or to the area exterior to the site, which do not modify drainage, shall be noted on Attachment D. Replacement of non-oil filled equipment or removal of oil filled equipment.

8.0 SPILL HISTORY AT THE FACILITY
(40 CFR Part 112.4(a) & 112.7(e)&(f)(3))

NOTES: Record minor and major oil spills at this facility. Date Volume Spilled Cause and Cleanup

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PGE0044796

ATTACHMENT B

Volume Range

of Oil/container

HARBORTON STORAGE YARD

Number of

Containers

Equipment

Unit Type

Number of

Units

	Per Unit		(Gallons) (*See Note 1)		
	YARD NO				
6	1	Transformers	3800 to 2700	Rectangular and/or oval steel tank	
3	1	Transformers	2400 to 2100	Rectangular and/or oval steel tank	
4	1	Transformers	1600 to 1100	Rectangular and/or oval steel tank	
1	1	Transformer	700	Rectangular and/or oval steel tank	
10	1	Regulators	800 to 500	Rectangular steel tank	
5	1	Regulators	180	Rectangular steel tank	
1	3	ОСВ	2000/tank	3 tanks/unit with circular steel case	
2	3	ОСВ	200/tank to	3 tanks/unit with circular steel case	
5	1	ОСВ	70/tank 45	Circular steel case	
1	1	Tank	800	Circular steel tank 4' dia. X 9' long	
1	1	Tank	11000	Circular fiberglass tank 10' dia. X 20' high	
1	1	Tank	700	Circular fiberglass tank 4' dia. X 8' long	
150	1	Drum	55	55 gallon steel drum	
STORARA (Within secur	GE YARD NO	.2			
3	1	Transformers	6700 to 6000	Rectangular and/or oval steel tank	
4	1	Transformers	4800 to 4100	Rectangular and/or oval steel tank	
2	1	Transformers	3700 to 1800	Rectangular and/or oval steel tank	
3	1	Transformers	1100 to 800	Rectangular and/or oval steel tank	
1	1	Tank	7000	Trailer tanker	
1	1	Tank	7000	Circular steel tank 8' dia. X 20' long	
1	1	Tank	10000	Circular steel tank 8' dia. X 30' long	
10	1	Drum	55	55 gallon steel drum	

Description of Tank Design

and Construction

ATTACHMENT B

		ATTAC	HIVIEIVI D		
HARBORTON	STORAG	E YARD (cont	inued)		
STORAGE YA (Within security fen					
1	1	Tank	10000	Circular steel tank 8' dia. X-30' long	_
STORAGE YA (Within the steel tar					
41	1	Drum	55	55 gallon drum (contain dry product)	_
NOTES:					
1. * Denotes listed	equipment a	nd tanks may cont	ain varying amounts of oil.		
2. Inventory of equi	ipment listed	was performed Au	igust 1,1997.		_
					_

VESSELS CONTAINING OIL AT HARBORTON STORAGE YARD

Item #	Co. ID#	Number of Containers	Type of Containers	Volume of Oil per Container (Gallons)	Overland Flow Rate from Container (gpm)	Description of Tank Design and Construction	Fail-Safe Engineering Features
1		1	USED OIL TANK	100	20 - 50	Double wall coated steel tank.	Manual Leak detection
2		4	USED OIL DRUMS	55	5 - 15	Single wall painted steel box holds four 55 gallon drums	Manual Leak detection
3		Above 50 Units	POLE MOUNT TRANSFORMERS	VARIES 5 - 200	1 - 25	Single wall coated steel	None
4		Above 20 Units	PAD MOUNT TRANSFORMERS	50 - 300	5 - 50	Single wall coated steel storage tank.	None
5		Above 10 Units	OTHER OIL FILLED TANKS	50 - 1,000	10 - 150	Single wall coated steel storage tank.	Vent
6		1	GASOLINE FUEL TANK	10,000	20 - 50	Double wall coated steel above ground fuel tank.	Automatic Leak detection monitor
7		1	DIESEL FUEL TANK	10,000	20 - 50	Double wall coated steel above ground fuel tank.	Automatic Leak detection monitor

NOTE: Containers of less than 55 gallons capacity are not requied to be listed in this SPCC Plan. (40 CFR Part 112.1(d)(2)(ii))

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(ATTACHMENT C)

(40 CFR Part 112.7(a)(4)&(5))

OIL SPILL CONTINGENCY PLAN

A copy of the Contingency Plan is kept on file at the Harborton Control House at the location shown on Attachment "A" (Site Plan) and at EM&C Headquarters. In addition to this Contingency Plan, procedural guides outlining the steps to be followed in reporting any oil discharge to the System Control Center are conspicuously attached to an inside wall of the Equipment Enclosure.

A copy of this plan is on file with the Environmental Services Department (ESD) and the original copy is kept on record in the System Engineering Department (SED) with the Engineer of record.

A procedural guide is also kept at the Repair Desk outlining the steps to be taken by that office in notifying the EM&C Oil Spill Response Crews.

In the event an oil discharge occurs at this site, the following contingency plan will be initiated immediately. (40 CFR Part 112.7(a)(5))

A. Immediate action to be taken if company personnel are on site

- 1. Make every reasonable effort to stop or retard the flow of oil from the container with manpower, equipment, and materials on site or otherwise immediately available.
- Notify the System Control Center of any oil leak or spilled oil at 464-8343 with the following information and conditions (40 CFR Part 112.7(a)(4)):
 - a. The facility name: (Harborton Storage Yard).
 - b. Location: (12500 NW Marina Way, Portland 97231).
 - c. Equipment from which the oil discharge originated: (See Attachments A & B).
 - d. An approximation of direction and quantity of flow: (See Attachments A & B).
 - e. Required time of response: (Estimated hours and minutes).

B. Action to be taken by System Control Center upon notification of an oil discharge

The System Control Center will immediately notify the Environmental Services Department and EM&C Headquarter Dispatch Desk or the designated representative per EM&C Emergency Call-Out Procedure. See References Attachment E Section 1 for the PGE Oil Spill Cleanup Procedure.

C. Action to be taken by EM&C manager's office

Dispatch PGE response personnel to evaluate and report site oil spill conditions. The crew shall stop any flow of oil and begin containment of any oil contaminated area and start cleanup procedures.

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D. Action to be taken by Environmental Services Department (ESD)

Report oil spill to regulatory agencies as required by DEQ and/or 40

CFR Part 302 (See Attachment F). (40 CFR Part 112.7(a)(3)(vi))

1. Any oil discharges reaching navigable waters or waters of the State of Oregon, ESD shall contact the Oregon Emergency Response System (OERS):

Oregon Emergency Response System 1-800-452-0311

or

State of Oregon Department of Environmental Quality DEQ Duty Officer 503- 229-5263
And contact the Duty Officer, National Response Center

1-(800- 424-8802 (24 hours)

FAILURE TO NOTIFY BOTH OF THE ABOVE AGENCIES IS A CRIMINAL OFFENSE PUNISHABLE BY A \$10,000 FINE AND/OR UP TO ONE YEAR IMPRISONMENT (OPA-92).

2. Discharges' not reaching navigable waters or waters of the State of Oregon and the release is 42 gallons or grater, ESD shall call:

Oregon Emergency Response System 1-800-452-0311

In the event OERS cannot be reached, call the: Duty Officer, National Response Center

1-800-424-8802 (24 hours)

FAILURE TO NOTIFY THE OREGON STATE DEPARTMENT OF ENVIRONMENTAL QUALITY SHALL BE SUBJECT TO A CIVIL PENALTY OF NOT LESS THAN \$50 AND NOT MORE THAN \$10,000 FOR EACH DAY OF VIOLATION.

Other Outside Notifications
 Police, Fire Medical, HazMat
 (Indicate if Hazardous Materials are involved)

E. Containment and removal of discharged oil and contaminated debris (40 CFR Part 112.7(a)(5) & (c)(1))

- All catch basins or drainage structures will be temporarily bermed or dammed to prevent oil from entering established watercourses or municipal drainage and sewer systems.
- 2. Adsorbing materials such as Fibrelite, absorbent pads, hay, sawdust, or sand shall be applied to the discharge area to absorb and contain the oil.

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- 3. If PGE spill response personnel and equipment cannot contain the discharged oil or if oil gets beyond the property area or if the magnitude of the discharge is such that additional manpower, equipment, or materials are required, contact NRS Environmental Company at 1-800-337-7455.
- 4. PGE spill response personnel and/or NRC Environmental Company shall completely clean up, remove, and dispose of oil and contaminated materials. Adsorbing materials, pumping equipment, front-end loaders, dump trucks, and other equipment deemed necessary, shall be made available on an emergency priority basis to affect the cleanup process.
- 5. Adsorbing materials, oil-soaked soil and gravel, and other contaminated debris will be moved to an authorized solid waste landfill. Contact the Environmental Services Department for a manifest number.
- 6. EM&C Oil Spill Response Crews or an approved contractor will accomplish removal of waterborne oil and contaminated waste.

 Contaminated materials are to be disposed of in accordance with State of Oregon Department of Environmental Quality regulations.

F. Follow-up Report

- 1. Environmental Services will prepare a complete report for the Environmental Services Department for subsequent submission to the U.S. Environmental Protection Agency and the State of Oregon Department of Environmental Quality if required. The report shall outline circumstances of the discharge, notification of appropriate Company and governmental agency personnel, containment procedures, removal and cleanup procedures, and final waste disposal procedures. This report will be filed following the oil discharge incident.
- 2. In the event of a reportable discharge (see 40 CFR Part 112.4(a), the certifying engineer shall be notified. The certifying engineer shall determine if additional preventive measures are needed or contemplated to minimize the possibility of recurrence. The Engineer shall review and make appropriate amendments to the SPCC Plan in accordance with 40 CFR Part 112.7.

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ATTACHMENT D-1

(40CFR Part 112.5 (b) & (c))

REVISIONS

SPILL PREVENTION CONTROL AND COUNTERMEASURE COMPLIANCE INSPECTION PLAN

In accordance with 40CFR Part 112.5(b & c), a review and evaluation of this Spill Prevention Control and Countermeasure (SPCC) Plan is conducted at least once every five years. As a result of this review and evaluation. Portland General Electric System Engineering will amend the SPCC Plan within six months of the review. The result will include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Any technical amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation, or maintenance occurrences which materially affects the facility potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

Changes to this SPCC Plan that are non-technical amendments like changes to phone number and names do not require PE certification. The following will suffice.

I have completed a review of the site and an evaluation of the SPCC Plan for the facility on (provide the date) and will (will not) amend the Plan as a result.

Review Dates	<u>Signature</u>	<u>Title of Position</u>	Amendment
(site) (plan)			(circle one)
		-	will / will not
			will / will not
			will / will not
			will / will not
	MANAGEMEN	T APPROVAL	
environment, and maintai		on of discharges of oil in to navigab pill prevention control and countern PCC Plan for this campus.	
Authorized Facility Rep	resentative: William E. Lav	wson	
Title: Senior Civil/Envir	ronmental Engineer Signa	ature:	

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ATTACHMENT D-2

(40 CFR Part 112.5(a))

OIL SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

FOR HARBORTON STORAGE YARD							
Revisions							
SUPV	ENGR	DATE	BY	DESCRIPTION	СНК	APPR	

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PORTLAND GENERAL ELECTRIC Field Review of the facility per 40 CFR Part 112.5(b)

FACILITIES INSPECTION

	view project profiles on record in the office. Note any changes to the site resulting from construction projects. ter job numbers on Attachment D.
Ch	eck and note arrangement for new or removed units.
	ok at drainage on the site and compare it with that shown on Attachment A of the existing SPCC plan. Note an inges.
No	te changes to site drainage and any off site changes to drainage systems or changes to natural drainage ways
Ma	rk on Attachment A the location of any wetland areas.
	ntify any changes to the fence line or property boundary.
sto	cument off site changes resulting from construction by others that may be impacted by an oil spill from the area ring oil filled equipment. Note if an oil spill containment system is impacted or if oil spill containment actures are needed or repair is required.
	ord on Attachment A any utilities that have been installed or changed
	port on the condition of the existing oil containment structures.
Che	eck oil spill containment kit. Record number Check to see if the kit has been opened.
Not	e if the total volume of oil for the site has changed as a result of oil filled equipment change out.
	eck with Environmental Services for reported oil spills for this substation. Record oil spills in section 8 on the e.
Rec	ord in section 8 of the SPCC plan, any visible sign of oil leaks or spills at the site.
Che unit	cck for changes in the serial number of oil filled equipment (the above ground tanks are the most important is).

Note: Submit copy to William E. Lawson 3WTC-Plaza. Attach photos if any. Revision: December 10, 2003

(ATTACHMENT E)

(40 CFR Part 112.3 (d)(1)(iii))

REFERENCES

SECTIONS:	
1)	PGE's Oil Spill Cleanup Procedure
2)	System Load Dispatch Oil/PCB Discharge Report
3)	Portland General Electric Oil Spill Report - Form (1058)
4)	PGE Report For Transporting Electrical Equipment Or Material - Form (0080)
5)	Emergency Response Plan Information (See Training Program)
6)	40 CFR Part 112.1 through Part 112.8 (August 16, 2002)

(ATTACHMENT F)

(40 CFR Part 110)

PGE's policy requires personnel to report all oil releases. Irrespective of the size or location of the spill or leak, personnel shall call Load Dispatch at 503-464-8343, regardless of whether it is a "spill event" under the following definition.

Note: the following defines whether a spill is a regulated reportable spill event under federal regulated reporting requirements.

THIS FOLLOWING SPIED IS NOT A "SPILLE VENT" per Federal Regulations, but must be report to PGE Load Dispatch at 503:464-8343.

- A spill that occurs on PGE property
 - AND -
- o PGE personnel are aware of it
 - AND
- Occurs on surfaces impervious to the substance spilled
 - <u>AND</u>
- o Is fully contained
 - AND
- O Is completely cleaned up with no further incident.

IF ANY OF THE ABOVE DO NOT APPLY

ANY OF THE FOLLOWING IS A "SPILLEVENT":

- O. <u>SPILLED OIL WHICH ENGERS OR THIREAGENS WATERS in harmful quantities (sufficient to cause a film, iridescent appearance or discoloration of surface or shoreline of waters or cause sludge or only deposits, oil with any quantity of RCB)</u>
- OR GREATER THAN 42 GALLONS OF SPILLED OIL that does not threaten to enter waters of the State of Oregon or "navigable waters"
- OR SPILLED OIL WITH A PCB CONCENTRATION GREATER THAN 50 ppm that involves grazing land, vegetable gardens, surface water, sewers, ground water or drinking water
- OR SPILLED OIL WITH GREATER THAN ONE POUND OF RCBs (for example an approximate 2600 gallon spill of oil containing 50 ppm PCBs)
- OR A HAZARDOUS MATERIAL RELEASE in such quantities that facility personnel cannot contain, it on PGE property and outside assistance is required to prevent or mitigate a release of reportable quantities (as defined in 40 CFR 302) to the environment:

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(ATTACHMENT G)

(40 CFR Part 112.3(d)(1)(iv))

INSPECTIONS, TESTS, AND RECORDS

Site specific information acquired by Portland General Electric personnel pertaining to site inspections, electrical equipment inspections, sample data, chain of custody, lab test results, maintenance records and specifications on oil filled electrical equipment is on file with EM&C at the Portland Service Center Office.

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